

# EXHIBIT A



State of Alabama Unified Judicial System Form ARCiv-93 Rev. 9/18	<b>COVER SHEET</b> <b>CIRCUIT COURT - CIVIL CASE</b> (Not For Domestic Relations Cases)	Case No. <b>01</b> CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA JACQUELINE ANDERSON SMITH, CLERK Date of Filing: 04/19/2023 Judge Code:
<b>GENERAL INFORMATION</b>		
<b>IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA</b> <b>EARL PETERSON JR ET AL v. 3M COMPANY ET AL</b>		
<b>First Plaintiff:</b> <input type="checkbox"/> Business <input checked="" type="checkbox"/> Individual <b>First Defendant:</b> <input checked="" type="checkbox"/> Business <input type="checkbox"/> Individual <input type="checkbox"/> Government <input type="checkbox"/> Other <input type="checkbox"/> Government <input type="checkbox"/> Other		
<b>NATURE OF SUIT:</b> Select primary cause of action, by checking box (check only one) that best characterizes your action:		
<b>TORTS: PERSONAL INJURY</b> <input type="checkbox"/> WDEA - Wrongful Death <input type="checkbox"/> TONG - Negligence: General <input type="checkbox"/> TOMV - Negligence: Motor Vehicle <input type="checkbox"/> TOWA - Wantonness <input checked="" type="checkbox"/> TOPL - Product Liability/AEMLD <input type="checkbox"/> TOMM - Malpractice-Medical <input type="checkbox"/> TOLM - Malpractice-Legal <input type="checkbox"/> TOOM - Malpractice-Other <input type="checkbox"/> TBFM - Fraud/Bad Faith/Misrepresentation <input type="checkbox"/> TOXX - Other: _____	<b>OTHER CIVIL FILINGS (cont'd)</b> <input type="checkbox"/> MSXX - Birth/Death Certificate Modification/Bond Forfeiture Appeal/ Enforcement of Agency Subpoena/Petition to Preserve <input type="checkbox"/> CVRT - Civil Rights <input type="checkbox"/> COND - Condemnation/Eminent Domain/Right-of-Way <input type="checkbox"/> CTMP - Contempt of Court <input type="checkbox"/> CONT - Contract/Ejectment/Writ of Seizure <input type="checkbox"/> TOCN - Conversion <input type="checkbox"/> EQND - Equity Non-Damages Actions/Declaratory Judgment/ Injunction Election Contest/Quiet Title/Sale For Division <input type="checkbox"/> CVUD - Eviction Appeal/Unlawful Detainer <input type="checkbox"/> FORJ - Foreign Judgment <input type="checkbox"/> FORF - Fruits of Crime Forfeiture <input type="checkbox"/> MSHC - Habeas Corpus/Extraordinary Writ/Mandamus/Prohibition <input type="checkbox"/> PFAB - Protection From Abuse <input type="checkbox"/> EPFA - Elder Protection From Abuse <input type="checkbox"/> QTLB - Quiet Title Land Bank <input type="checkbox"/> FELA - Railroad/Seaman (FELA) <input type="checkbox"/> RPRO - Real Property <input type="checkbox"/> WTEG - Will/Trust/Estate/Guardianship/Conservatorship <input type="checkbox"/> COMP - Workers' Compensation <input type="checkbox"/> CVXX - Miscellaneous Circuit Civil Case	
<b>TORTS: PERSONAL INJURY</b> <input type="checkbox"/> TOPE - Personal Property <input type="checkbox"/> TORE - Real Property		
<b>OTHER CIVIL FILINGS</b> <input type="checkbox"/> ABAN - Abandoned Automobile <input type="checkbox"/> ACCT - Account & Nonmortgage <input type="checkbox"/> APAA - Administrative Agency Appeal <input type="checkbox"/> ADPA - Administrative Procedure Act <input type="checkbox"/> ANPS - Adults in Need of Protective Service		
<b>ORIGIN:</b> F <input checked="" type="checkbox"/> <b>INITIAL FILING</b> A <input type="checkbox"/> <b>APPEAL FROM DISTRICT COURT</b> O <input type="checkbox"/> <b>OTHER</b> R <input type="checkbox"/> <b>REMANDED</b> T <input type="checkbox"/> <b>TRANSFERRED FROM OTHER CIRCUIT COURT</b>		
<b>HAS JURY TRIAL BEEN DEMANDED?</b> <input checked="" type="checkbox"/> <b>YES</b> <input type="checkbox"/> <b>NO</b> <b>Note:</b> Checking "Yes" does not constitute a demand for a jury trial. (See Rules 38 and 39, Ala.R.Civ.P., for procedure)		
<b>RELIEF REQUESTED:</b> <input checked="" type="checkbox"/> <b>MONETARY AWARD REQUESTED</b> <input type="checkbox"/> <b>NO MONETARY AWARD REQUESTED</b>		
<b>ATTORNEY CODE:</b> <div style="display: flex; justify-content: space-between;"> <div style="width: 30%;">CAD010</div> <div style="width: 30%; text-align: center;">4/19/2023 5:42:10 PM Date</div> <div style="width: 30%; text-align: right;">/s/ GREGORY A. CADE Signature of Attorney/Party filing this form</div> </div>		
<b>MEDIATION REQUESTED:</b> <input type="checkbox"/> <b>YES</b> <input checked="" type="checkbox"/> <b>NO</b> <input type="checkbox"/> <b>UNDECIDED</b>		
<b>Election to Proceed under the Alabama Rules for Expedited Civil Actions:</b> <input type="checkbox"/> <b>YES</b> <input type="checkbox"/> <b>NO</b>		

**IN THE CIRCUIT COURT  
FOR THE TENTH JUDICIAL CIRCUIT  
JEFFERSON COUNTY, ALABAMA**

**EARL PETERSON JR;  
JACK WILLIAM TOP;  
THOMAS JOHN TORATTI;  
WILLMER A. TORRES;  
LAWRENCE RAY TOWNSEND;  
RONALD JAY TOXEY;  
MICHAEL JOSEPH TRACEY;  
GARY WAYNE TRACY;  
STEVEN JAMES TRAHAN;  
KEVIN JOHN TREMBLETT;  
JAMES ROBERT TRESS;  
CHARLES GREGORY TRUVILLION  
SR.;  
LEONARD TUCK;  
WILLMON TUNSTALL;  
ROBERT STEPHEN TURINSKI;  
ALLEN TURNER;  
MALCOLM ELLIS TURNER;  
LEONARD CARL TURNER;  
MARK ROBERT TURO;  
FRANK LOUIS TUZZOLINO;  
EDWARD LEE UETZ;  
DONALD EUGENE UMLAUF;  
DARRYL FLYNN UNDERWOOD;  
DOUGLAS CARL UNDERWOOD;  
JOSEPH UNTISZ;  
JOHN ARTHUR URBAN;  
ELMER EDWARD URBESO JR.;  
LAURO INDALECIO URIBE;  
CARL FRANCIS URMAN;  
GERARD J. UZZI;  
JOHN ANTHONY VAIL;  
PATRICK THOMAS VALDEZ SR.;  
ALLEN WILSON VALENTINE III;  
JOSEPH LAWRENCE VALIQUETTE;  
DONALD R. VANCE;  
JOHN HILBERT VANDEN AVOND;  
RUSSELL JAMES VANDVER;  
RONALD WAYNE VASTINE;  
JAMES CAMERON VAUGHAN;  
CARL VAUGHN;  
THOMAS LEE VAUGHN;**

**Civil Action No:** \_\_\_\_\_

**COMPLAINT AND  
JURY DEMAND**

**GEORGE PATRICK VELASCO;  
GEORGE JAMES VENDETTI;  
JOSEPH PAUL VEREB;  
KEVIN CODY VERNON;  
JOHN THOMAS VESELKA;  
PATRICK VISSICHELLI;  
DESI D. WADE;  
MILTON TYRONE WADE;  
WILLIAM LAMONT WADE;  
CARL DAVID WAGNER;  
ELIJAH ANDRE WALKER;  
DENNIS WALKER;  
BRUCE W. WALKER;  
ALLEN DAVID WALKUP;  
DONALD R. WALL;  
JAMES BYRON WALLER;  
HERBERT THOMAS WALLS;  
WILLIAM STUART WALTON;  
STEPHEN FRANCIS WALTON;  
HARRY STEVEN WARD;  
MICHAEL SHANE WARD;  
RICHARD WARDLOW JR.;  
F. CARL WARNER;  
CARLTON WARREN;  
CHARLES RAY WARREN;  
MICHAEL WASILEWSKI SR.;  
DAVID LEE WATERS;  
GEORGE GODFREY WATKINS JR.;  
CLARENCE OREN WEATHERFORD;  
KEITH RANDALL WEATHERFORD;  
CARL CLACKLEY WEATHERS JR;  
FLOYD ALLAN WEBB;  
JOSEPH EDWARD WEBER;  
WILLIE WEBSTER JR.;  
ROGER DALE WEHRKAMP;  
JEFFREY CHARLES WEIR;  
NELSON HARLON WEIRICK;  
LAWRENCE BERNARD WEIRUM;  
DWIGHT ALDEN WEISS;  
CHARLES ROBERT WEISS;  
ROBERT THOMAS WELCH;  
EDWIN EUGENE WELCH;  
MICHAEL LYNN WELCH;  
RONALD EUGENE WELLS SR;  
LAWRENCE EDWARD WELLS;  
JOHN H. WELLS;**

**ROBERT OWEN WELLS JR;  
GERARD LOUIS WERRELL;  
FREDERICK ELMER WESEMAN;  
AARON LEE WESLEY;  
STEPHON LAVEN WESS;  
WILLIAM LOYD WEST;  
JAMES R. WEST;  
CRAIG WINSTON WEST SR;  
DAVID CARLTON WESTFIELD;  
DAVID JOSEPH WETZEL;  
THOMAS JEROLD WHEATLEY;  
GREGORY WHEELESS;  
CARL LORY WHITAKER JR;  
DANIEL CLARK WHITE;  
ROBERT EDWARD WHITE;  
KEVIN EUGENE WHITE;  
FRANK EDWARD WHITE SR.;  
MICHAEL JOSEPH WHITE;  
GARNELL WILBORN WHITFIELD JR.;  
RONALD JAMES WHITING;  
KARL ALLEN WHITT;  
STEVEN DOUGLAS WILCOX;  
RICHARD ALLAN WILCOX;  
MAXIE DOUGLAS WILKINSON;  
ARTHUR WILLIAMS;  
GERALD EDWARD WILLIAMS;  
WAYNE WILLIAMS;  
JEFFREY SCOTT YOUNG;  
ROBERT ALLEN YOUNG;  
GEORGE YUHAS;  
WAYNE RICHARD ZAMAGNE;  
MARIO LEEROY ZAMORA SR;  
JAMES WILFRED ZEIRKE;  
DAVID ALLEN ZIETLOW;  
MICHAEL RAY ZIMMERMAN;  
THOMAS JOHN ZURAWSKI;  
ROBERT J. ZDZINICKI,**

**Plaintiffs,**

**v.**

**3M COMPANY (f/k/a Minnesota  
Mining and Manufacturing Company);  
AGC CHEMICALS AMERICAS INC.;  
AMEREX CORPORATION;**

**ARCHROMA U.S. INC.;**  
**ARKEMA, INC.;**  
**BUCKEYE FIRE EQUIPMENT**  
**COMPANY;**  
**CARRIER GLOBAL CORPORATION;**  
**CHEMDESIGN PRODUCTS, INC.;**  
**CHEMGUARD, INC.;**  
**CHEMICALS, INC.;**  
**CHEMOURS COMPANY FC, LLC;**  
**CLARIANT CORP.;**  
**CORTEVA, INC.;**  
**DEEPWATER CHEMICALS, INC.;**  
**DU PONT DE NEMOURS INC. (f/k/a**  
**DOWDUPONT INC.);**  
**DYNAX CORPORATION;**  
**E.I. DU PONT DE NEMOURS AND**  
**COMPANY;**  
**KIDDE-FENWAL, INC.;**  
**KIDDE PLC;**  
**NATION FORD CHEMICAL**  
**COMPANY;**  
**NATIONAL FOAM, INC.;**  
**THE CHEMOURS COMPANY;**  
**TYCO FIRE PRODUCTS LP, as**  
**successor-in-interest to The Ansul**  
**Company;**  
**UNITED TECHNOLOGIES**  
**CORPORATION;**  
**UTC FIRE & SECURITY AMERICAS**  
**CORPORATION, INC. (f/k/a GE**  
**Interlogix, Inc.);**  
**ALLSTAR FIRE EQUIPMENT;**  
**FIRE-DEX, LLC;**  
**GLOBE MANUFACTURING COMPANY**  
**LLC;**  
**HONEYWELL SAFETY PRODUCT USA,**  
**INC.;**  
**LION GROUP, INC.;**  
**MALLORY SAFETY AND SUPPLY**  
**LLC;**  
**MINE SAFETY APPLIANCES CO., LLC;**  
**MUNICIPAL EMERGENCY SERVICES,**  
**INC.;**  
**PBI PERFORMANCE PRODUCTS, INC.;**  
**SOUTHERN MILLS, INC.;**  
**STEDFAST USA, INC.;**

**W.L. GORE & ASSOCIATES INC.,**

**Defendants.**

### **COMPLAINT**

COMES NOW, the Plaintiffs, by and through undersigned counsel, and allege upon information and belief as follows:

### **INTRODUCTION**

1. Plaintiffs bring this action for damages for personal injury resulting from exposure to aqueous film-forming foams (“AFFF”) and firefighter turnout gear (“TOG”) containing the toxic chemicals collectively known as per and polyfluoroalkyl substances (“PFAS”). PFAS includes, but is not limited to, perfluorooctanoic acid (“PFOA”) and perfluorooctane sulfonic acid (“PFOS”) and related chemicals including those that degrade to PFOA and/or PFOS.

2. AFFF is a specialized substance designed to extinguish petroleum-based fires. It has been used for decades by military and civilian firefighters to extinguish fires in training and in response to Class B fires.

3. TOG is personal protective equipment designed for heat and moisture resistance in order to protect firefighters in hazardous situations. Most turnout gear is made up of a thermal liner, moisture barrier, and an outer layer. The inner layers contain PFAS, and the outer layer is often treated with additional PFAS.

4. Defendants collectively designed, marketed, developed, manufactured, distributed, released, trained users, produced instructional materials, promoted, sold, and/or otherwise released into the stream of commerce AFFF or TOG with knowledge that it contained highly toxic and bio-persistent PFAS, which would expose end users of the product to the risks associated with PFAS. Further, defendants designed, marketed, developed, manufactured, distributed, released, trained

users, produced instructional materials, promoted, sold and/or otherwise handled and/or used underlying chemicals and/or products added to AFFF or TOG which contained PFAS for use in firefighting.

5. PFAS binds to proteins in the blood of humans exposed to the material and remains and persists over long periods of time. Due to their unique chemical structure, PFAS accumulates in the blood and body of exposed individuals.

6. PFAS are highly toxic and carcinogenic chemicals. Defendants knew, or should have known, that PFAS remain in the human body while presenting significant health risks to humans.

7. Defendants' PFAS-containing AFFF or TOG products were used by the Plaintiffs in their intended manner, without significant change in the products' condition. Plaintiffs were unaware of the dangerous properties of the Defendants' AFFF or TOG products and relied on the Defendants' instructions as to the proper handling of the products. Plaintiffs' consumption, inhalation and/or dermal absorption of PFAS from Defendant's AFFF or TOG products caused Plaintiffs to develop the serious medical conditions and complications alleged herein.

8. Through this action, Plaintiffs seek to recover compensatory and punitive damages arising out of the permanent and significant damages sustained as a direct result of exposure to Defendants' AFFF or TOG products at various locations during the course of Plaintiffs' training and firefighting activities. Plaintiffs further seek injunctive, equitable, and declaratory relief arising from the same.

### **JURISDICTION AND VENUE**

9. The Defendants are subject to the jurisdiction of this Court on the grounds that (a) one or more of the Defendants is a foreign corporation whose principal place of business is located in the State of Alabama; (b) one or more of the Defendants are foreign corporations that either are



registered to conduct business in the State of Alabama and have actually transacted business in Alabama; and/or (c) one or more of the Defendants is a domestic corporation native to the State of Alabama.

10. Venue is proper pursuant to *Alabama Code Section 6-3-7* as significant events resulting in the cause of action and subsequent injuries occurred in this county.

11. Joinder of all parties is proper pursuant to Rule 20(a) of the *Alabama Rules of Civil Procedure*. Defendants are permissively joined in this action because the exposure, injuries, and relief requested all arise out of similar occurrences or transactions and questions of law and fact are common to all parties.

### **PARTIES**

12. Plaintiff Earl Peterson Jr is a resident and citizen of Birmingham, Alabama. Plaintiff regularly used, and was thereby directly exposed to, AFFF and TOG in training and to extinguish fires during his working career as a military and/or civilian firefighter.

13. Plaintiff Earl Peterson Jr was diagnosed with prostate cancer as a result of exposure to Defendants' AFFF or TOG products.

14. Plaintiff Jack William Top is a resident and citizen of Chicago, Illinois. Plaintiff regularly used, and was thereby directly exposed to, AFFF and TOG in training and to extinguish fires during his working career as a military and/or civilian firefighter.

15. Plaintiff Jack William Top was diagnosed with prostate cancer as a result of exposure to Defendants' AFFF or TOG products.

16. Plaintiff Thomas John Toratti is a resident and citizen of Ranier, Minnesota. Plaintiff regularly used, and was thereby directly exposed to, AFFF and TOG in training and to extinguish fires during his working career as a military and/or civilian firefighter.

17. Plaintiff Thomas John Toratti was diagnosed with prostate cancer as a result of exposure to Defendants' AFFF or TOG products.

18. Plaintiff Willmer A. Torres is a resident and citizen of Milford, Pennsylvania. Plaintiff regularly used, and was thereby directly exposed to, AFFF and TOG in training and to extinguish fires during his working career as a military and/or civilian firefighter.

19. Plaintiff Willmer A. Torres was diagnosed with prostate cancer as a result of exposure to Defendants' AFFF or TOG products.

20. Plaintiff Lawrence Ray Townsend is a resident and citizen of Fort Mohave, Arizona. Plaintiff regularly used, and was thereby directly exposed to, AFFF and TOG in training and to extinguish fires during his working career as a military and/or civilian firefighter.

21. Plaintiff Lawrence Ray Townsend was diagnosed with bladder cancer as a result of exposure to Defendants' AFFF or TOG products.

22. Plaintiff Ronald Jay Toxey is a resident and citizen of Virginia Beach, Virginia. Plaintiff regularly used, and was thereby directly exposed to, AFFF and TOG in training and to extinguish fires during his working career as a military and/or civilian firefighter.

23. Plaintiff Ronald Jay Toxey was diagnosed with prostate cancer as a result of exposure to Defendants' AFFF or TOG products.

24. Plaintiff Michael Joseph Tracey is a resident and citizen of Saint Augustine, Florida. Plaintiff regularly used, and was thereby directly exposed to, AFFF and TOG in training and to extinguish fires during his working career as a military and/or civilian firefighter.

25. Plaintiff Michael Joseph Tracey was diagnosed with bladder cancer as a result of exposure to Defendants' AFFF or TOG products.

26. Plaintiff Gary Wayne Tracy is a resident and citizen of Montrose, Colorado. Plaintiff regularly used, and was thereby directly exposed to, AFFF and TOG in training and to extinguish fires during his working career as a military and/or civilian firefighter.

27. Plaintiff Gary Wayne Tracy was diagnosed with prostate cancer as a result of exposure to Defendants' AFFF or TOG products.

28. Plaintiff Steven James Trahan is a resident and citizen of Hahnville, Louisiana. Plaintiff regularly used, and was thereby directly exposed to, AFFF and TOG in training and to extinguish fires during his working career as a military and/or civilian firefighter.

29. Plaintiff Steven James Trahan was diagnosed with prostate cancer as a result of exposure to Defendants' AFFF or TOG products.

30. Plaintiff Kevin John Tremblett is a resident and citizen of East Amherst, New York. Plaintiff regularly used, and was thereby directly exposed to, AFFF and TOG in training and to extinguish fires during his working career as a military and/or civilian firefighter.

31. Plaintiff Kevin John Tremblett was diagnosed with prostate cancer as a result of exposure to Defendants' AFFF or TOG products.

32. Plaintiff James Robert Tress is a resident and citizen of Marinette, Wisconsin. Plaintiff regularly used, and was thereby directly exposed to, AFFF and TOG in training and to extinguish fires during his working career as a military and/or civilian firefighter.

33. Plaintiff James Robert Tress was diagnosed with prostate cancer as a result of exposure to Defendants' AFFF or TOG products.

34. Plaintiff Charles Gregory Truvillion Sr. is a resident and citizen of Bakersfield, California. Plaintiff regularly used, and was thereby directly exposed to, AFFF and TOG in training and to extinguish fires during his working career as a military and/or civilian firefighter.

35. Plaintiff Charles Gregory Truvillion Sr. was diagnosed with prostate cancer as a result of exposure to Defendants' AFFF or TOG products.

36. Plaintiff Leonard Tuck is a resident and citizen of Alpine, Alabama. Plaintiff regularly used, and was thereby directly exposed to, AFFF and TOG in training and to extinguish fires during his working career as a military and/or civilian firefighter.

37. Plaintiff Leonard Tuck was diagnosed with prostate cancer as a result of exposure to Defendants' AFFF or TOG products.

38. Plaintiff Willmon Tunstall is a resident and citizen of Mobile, Alabama. Plaintiff regularly used, and was thereby directly exposed to, AFFF and TOG in training and to extinguish fires during his working career as a military and/or civilian firefighter.

39. Plaintiff Willmon Tunstall was diagnosed with prostate cancer as a result of exposure to Defendants' AFFF or TOG products.

40. Plaintiff Robert Stephen Turinski is a resident and citizen of Bear Creek Township, Pennsylvania. Plaintiff regularly used, and was thereby directly exposed to, AFFF and TOG in training and to extinguish fires during his working career as a military and/or civilian firefighter.

41. Plaintiff Robert Stephen Turinski was diagnosed with bladder cancer as a result of exposure to Defendants' AFFF or TOG products.

42. Plaintiff Allen Turner is a resident and citizen of Boligee, Alabama. Plaintiff regularly used, and was thereby directly exposed to, AFFF and TOG in training and to extinguish fires during his working career as a military and/or civilian firefighter.

43. Plaintiff Allen Turner was diagnosed with prostate cancer as a result of exposure to Defendants' AFFF or TOG products.

44. Plaintiff Malcolm Ellis Turner is a resident and citizen of Albuquerque, New Mexico. Plaintiff regularly used, and was thereby directly exposed to, AFFF and TOG in training and to extinguish fires during his working career as a military and/or civilian firefighter.

45. Plaintiff Malcolm Ellis Turner was diagnosed with prostate cancer as a result of exposure to Defendants' AFFF or TOG products.

46. Plaintiff Leonard Carl Turner is a resident and citizen of Tulsa, Oklahoma. Plaintiff regularly used, and was thereby directly exposed to, AFFF and TOG in training and to extinguish fires during his working career as a military and/or civilian firefighter.

47. Plaintiff Leonard Carl Turner was diagnosed with prostate cancer as a result of exposure to Defendants' AFFF or TOG products.

48. Plaintiff Mark Robert Turo is a resident and citizen of Riley, Michigan. Plaintiff regularly used, and was thereby directly exposed to, AFFF and TOG in training and to extinguish fires during his working career as a military and/or civilian firefighter.

49. Plaintiff Mark Robert Turo was diagnosed with prostate cancer as a result of exposure to Defendants' AFFF or TOG products.

50. Plaintiff Frank Louis Tuzzolino is a resident and citizen of Port Saint Lucie, Florida. Plaintiff regularly used, and was thereby directly exposed to, AFFF and TOG in training and to extinguish fires during his working career as a military and/or civilian firefighter.

51. Plaintiff Frank Louis Tuzzolino was diagnosed with bladder cancer as a result of exposure to Defendants' AFFF or TOG products.

52. Plaintiff Edward Lee Uetz is a resident and citizen of Bethalto, Illinois. Plaintiff regularly used, and was thereby directly exposed to, AFFF and TOG in training and to extinguish fires during his working career as a military and/or civilian firefighter.

53. Plaintiff Edward Lee Uetz was diagnosed with prostate cancer as a result of exposure to Defendants' AFFF or TOG products.

54. Plaintiff Donald Eugene Umlauf is a resident and citizen of Niagara Falls, New York. Plaintiff regularly used, and was thereby directly exposed to, AFFF and TOG in training and to extinguish fires during his working career as a military and/or civilian firefighter.

55. Plaintiff Donald Eugene Umlauf was diagnosed with prostate cancer as a result of exposure to Defendants' AFFF or TOG products.

56. Plaintiff Darryl Flynn Underwood is a resident and citizen of Gobles, Michigan. Plaintiff regularly used, and was thereby directly exposed to, AFFF and TOG in training and to extinguish fires during his working career as a military and/or civilian firefighter.

57. Plaintiff Darryl Flynn Underwood was diagnosed with prostate cancer as a result of exposure to Defendants' AFFF or TOG products.

58. Plaintiff Douglas Carl Underwood is a resident and citizen of Mullins, South Carolina. Plaintiff regularly used, and was thereby directly exposed to, AFFF and TOG in training and to extinguish fires during his working career as a military and/or civilian firefighter.

59. Plaintiff Douglas Carl Underwood was diagnosed with prostate cancer as a result of exposure to Defendants' AFFF or TOG products.

60. Plaintiff Joseph Untisz is a resident and citizen of Hazlet, New Jersey. Plaintiff regularly used, and was thereby directly exposed to, AFFF and TOG in training and to extinguish fires during his working career as a military and/or civilian firefighter.

61. Plaintiff Joseph Untisz was diagnosed with prostate cancer as a result of exposure to Defendants' AFFF or TOG products.

62. Plaintiff John Arthur Urban is a resident and citizen of Kenna, West Virginia. Plaintiff regularly used, and was thereby directly exposed to, AFFF and TOG in training and to extinguish fires during his working career as a military and/or civilian firefighter.

63. Plaintiff John Arthur Urban was diagnosed with bladder cancer as a result of exposure to Defendants' AFFF or TOG products.

64. Plaintiff Elmer Edward Urbeso Jr. is a resident and citizen of Slidell, Louisiana. Plaintiff regularly used, and was thereby directly exposed to, AFFF and TOG in training and to extinguish fires during his working career as a military and/or civilian firefighter.

65. Plaintiff Elmer Edward Urbeso Jr. was diagnosed with prostate cancer as a result of exposure to Defendants' AFFF or TOG products.

66. Plaintiff Lauro Indalecio Uribe is a resident and citizen of San Antonio, Texas. Plaintiff regularly used, and was thereby directly exposed to, AFFF and TOG in training and to extinguish fires during his working career as a military and/or civilian firefighter.

67. Plaintiff Lauro Indalecio Uribe was diagnosed with prostate cancer as a result of exposure to Defendants' AFFF or TOG products.

68. Plaintiff Carl Francis Urman is a resident and citizen of Temecula, California. Plaintiff regularly used, and was thereby directly exposed to, AFFF and TOG in training and to extinguish fires during his working career as a military and/or civilian firefighter.

69. Plaintiff Carl Francis Urman was diagnosed with prostate cancer as a result of exposure to Defendants' AFFF or TOG products.

70. Plaintiff Gerard J. Uzzi is a resident and citizen of East Meadow, New York. Plaintiff regularly used, and was thereby directly exposed to, AFFF and TOG in training and to extinguish fires during his working career as a military and/or civilian firefighter.

71. Plaintiff Gerard J. Uzzi was diagnosed with prostate cancer as a result of exposure to Defendants' AFFF or TOG products.

72. Plaintiff John Anthony Vail is a resident and citizen of Hamilton, Ohio. Plaintiff regularly used, and was thereby directly exposed to, AFFF and TOG in training and to extinguish fires during his working career as a military and/or civilian firefighter.

73. Plaintiff John Anthony Vail was diagnosed with prostate cancer as a result of exposure to Defendants' AFFF or TOG products.

74. Plaintiff Patrick Thomas Valdez Sr. is a resident and citizen of Springtown, Texas. Plaintiff regularly used, and was thereby directly exposed to, AFFF and TOG in training and to extinguish fires during his working career as a military and/or civilian firefighter.

75. Plaintiff Patrick Thomas Valdez Sr. was diagnosed with pancreatic cancer as a result of exposure to Defendants' AFFF or TOG products.

76. Plaintiff Allen Wilson Valentine III is a resident and citizen of Juneau, Alaska. Plaintiff regularly used, and was thereby directly exposed to, AFFF and TOG in training and to extinguish fires during his working career as a military and/or civilian firefighter.

77. Plaintiff Allen Wilson Valentine III was diagnosed with prostate cancer as a result of exposure to Defendants' AFFF or TOG products.

78. Plaintiff Joseph Lawrence Valiquette is a resident and citizen of Lewiston, Michigan. Plaintiff regularly used, and was thereby directly exposed to, AFFF and TOG in training and to extinguish fires during his working career as a military and/or civilian firefighter.

79. Plaintiff Joseph Lawrence Valiquette was diagnosed with bladder cancer as a result of exposure to Defendants' AFFF or TOG products.



80. Plaintiff Donald R. Vance is a resident and citizen of Sheridan, Arkansas. Plaintiff regularly used, and was thereby directly exposed to, AFFF and TOG in training and to extinguish fires during his working career as a military and/or civilian firefighter.

81. Plaintiff Donald R. Vance was diagnosed with prostate cancer as a result of exposure to Defendants' AFFF or TOG products.

82. Plaintiff John Hilbert Vanden Avond is a resident and citizen of Green Bay, Wisconsin. Plaintiff regularly used, and was thereby directly exposed to, AFFF and TOG in training and to extinguish fires during his working career as a military and/or civilian firefighter.

83. Plaintiff John Hilbert Vanden Avond was diagnosed with bladder cancer as a result of exposure to Defendants' AFFF or TOG products.

84. Plaintiff Russell James Vandver is a resident and citizen of Olympia, Washington. Plaintiff regularly used, and was thereby directly exposed to, AFFF and TOG in training and to extinguish fires during his working career as a military and/or civilian firefighter.

85. Plaintiff Russell James Vandver was diagnosed with prostate cancer as a result of exposure to Defendants' AFFF or TOG products.

86. Plaintiff Ronald Wayne Vastine is a resident and citizen of Glendale, Arizona. Plaintiff regularly used, and was thereby directly exposed to, AFFF and TOG in training and to extinguish fires during his working career as a military and/or civilian firefighter.

87. Plaintiff Ronald Wayne Vastine was diagnosed with bladder cancer as a result of exposure to Defendants' AFFF or TOG products.

88. Plaintiff James Cameron Vaughan is a resident and citizen of Chesapeake Beach, Maryland. Plaintiff regularly used, and was thereby directly exposed to, AFFF and TOG in training and to extinguish fires during his working career as a military and/or civilian firefighter.

89. Plaintiff James Cameron Vaughan was diagnosed with bladder cancer as a result of exposure to Defendants' AFFF or TOG products.

90. Plaintiff Carl Vaughn is a resident and citizen of Baltimore, Maryland. Plaintiff regularly used, and was thereby directly exposed to, AFFF and TOG in training and to extinguish fires during his working career as a military and/or civilian firefighter.

91. Plaintiff Carl Vaughn was diagnosed with prostate cancer as a result of exposure to Defendants' AFFF or TOG products.

92. Plaintiff Thomas Lee Vaughn is a resident and citizen of Geary, Oklahoma. Plaintiff regularly used, and was thereby directly exposed to, AFFF and TOG in training and to extinguish fires during his working career as a military and/or civilian firefighter.

93. Plaintiff Thomas Lee Vaughn was diagnosed with prostate cancer as a result of exposure to Defendants' AFFF or TOG products.

94. Plaintiff George Patrick Velasco is a resident and citizen of Tucson, Arizona. Plaintiff regularly used, and was thereby directly exposed to, AFFF and TOG in training and to extinguish fires during his working career as a military and/or civilian firefighter.

95. Plaintiff George Patrick Velasco was diagnosed with prostate cancer as a result of exposure to Defendants' AFFF or TOG products.

96. Plaintiff George James Vendetti is a resident and citizen of Stoneham, Massachusetts. Plaintiff regularly used, and was thereby directly exposed to, AFFF and TOG in training and to extinguish fires during his working career as a military and/or civilian firefighter.

97. Plaintiff George James Vendetti was diagnosed with prostate cancer as a result of exposure to Defendants' AFFF or TOG products.

98. Plaintiff Joseph Paul Vereb is a resident and citizen of Howell, Michigan. Plaintiff regularly used, and was thereby directly exposed to, AFFF and TOG in training and to extinguish fires during his working career as a military and/or civilian firefighter.

99. Plaintiff Joseph Paul Vereb was diagnosed with prostate cancer as a result of exposure to Defendants' AFFF or TOG products.

100. Plaintiff Kevin Cody Vernon is a resident and citizen of Pearl City, Hawaii. Plaintiff regularly used, and was thereby directly exposed to, AFFF and TOG in training and to extinguish fires during his working career as a military and/or civilian firefighter.

101. Plaintiff Kevin Cody Vernon was diagnosed with prostate cancer as a result of exposure to Defendants' AFFF or TOG products.

102. Plaintiff John Thomas Veselka is a resident and citizen of Beeville, Texas. Plaintiff regularly used, and was thereby directly exposed to, AFFF and TOG in training and to extinguish fires during his working career as a military and/or civilian firefighter.

103. Plaintiff John Thomas Veselka was diagnosed with prostate cancer as a result of exposure to Defendants' AFFF or TOG products.

104. Plaintiff Patrick Vissichelli is a resident and citizen of Locust Valley, New York. Plaintiff regularly used, and was thereby directly exposed to, AFFF and TOG in training and to extinguish fires during his working career as a military and/or civilian firefighter.

105. Plaintiff Patrick Vissichelli was diagnosed with prostate cancer as a result of exposure to Defendants' AFFF or TOG products.

106. Plaintiff Desi D. Wade is a resident and citizen of Conyers, Georgia. Plaintiff regularly used, and was thereby directly exposed to, AFFF and TOG in training and to extinguish fires during his working career as a military and/or civilian firefighter.

107. Plaintiff Desi D. Wade was diagnosed with prostate cancer as a result of exposure to Defendants' AFFF or TOG products.

108. Plaintiff Milton Tyrone Wade is a resident and citizen of Union, New Jersey. Plaintiff regularly used, and was thereby directly exposed to, AFFF and TOG in training and to extinguish fires during his working career as a military and/or civilian firefighter.

109. Plaintiff Milton Tyrone Wade was diagnosed with prostate cancer as a result of exposure to Defendants' AFFF or TOG products.

110. Plaintiff William Lamont Wade is a resident and citizen of Hampton, Virginia. Plaintiff regularly used, and was thereby directly exposed to, AFFF and TOG in training and to extinguish fires during his working career as a military and/or civilian firefighter.

111. Plaintiff William Lamont Wade was diagnosed with prostate cancer as a result of exposure to Defendants' AFFF or TOG products.

112. Plaintiff Carl David Wagner is a resident and citizen of Glocester, Rhode Island. Plaintiff regularly used, and was thereby directly exposed to, AFFF and TOG in training and to extinguish fires during his working career as a military and/or civilian firefighter.

113. Plaintiff Carl David Wagner was diagnosed with prostate cancer as a result of exposure to Defendants' AFFF or TOG products.

114. Plaintiff Elijah Andre Walker is a resident and citizen of Birmingham, Alabama. Plaintiff regularly used, and was thereby directly exposed to, AFFF and TOG in training and to extinguish fires during his working career as a military and/or civilian firefighter.

115. Plaintiff Elijah Andre Walker was diagnosed with prostate cancer as a result of exposure to Defendants' AFFF or TOG products.

116. Plaintiff Dennis Walker is a resident and citizen of Willis, Michigan. Plaintiff regularly used, and was thereby directly exposed to, AFFF and TOG in training and to extinguish fires during his working career as a military and/or civilian firefighter.

117. Plaintiff Dennis Walker was diagnosed with prostate cancer as a result of exposure to Defendants' AFFF or TOG products.

118. Plaintiff Bruce W. Walker is a resident and citizen of Prairie Du Sac, Wisconsin. Plaintiff regularly used, and was thereby directly exposed to, AFFF and TOG in training and to extinguish fires during his working career as a military and/or civilian firefighter.

119. Plaintiff Bruce W. Walker was diagnosed with bladder cancer as a result of exposure to Defendants' AFFF or TOG products.

120. Plaintiff Allen David Walkup is a resident and citizen of Virginia Beach, Virginia. Plaintiff regularly used, and was thereby directly exposed to, AFFF and TOG in training and to extinguish fires during his working career as a military and/or civilian firefighter.

121. Plaintiff Allen David Walkup was diagnosed with prostate cancer as a result of exposure to Defendants' AFFF or TOG products.

122. Plaintiff Donald R. Wall is a resident and citizen of Harrisburg, Illinois. Plaintiff regularly used, and was thereby directly exposed to, AFFF and TOG in training and to extinguish fires during his working career as a military and/or civilian firefighter.

123. Plaintiff Donald R. Wall was diagnosed with prostate cancer as a result of exposure to Defendants' AFFF or TOG products.

124. Plaintiff James Byron Waller is a resident and citizen of Locust Fork, Alabama. Plaintiff regularly used, and was thereby directly exposed to, AFFF and TOG in training and to extinguish fires during his working career as a military and/or civilian firefighter.

125. Plaintiff James Byron Waller was diagnosed with prostate cancer as a result of exposure to Defendants' AFFF or TOG products.

126. Plaintiff Herbert Thomas Walls is a resident and citizen of Cary, North Carolina. Plaintiff regularly used, and was thereby directly exposed to, AFFF and TOG in training and to extinguish fires during his working career as a military and/or civilian firefighter.

127. Plaintiff Herbert Thomas Walls was diagnosed with prostate cancer as a result of exposure to Defendants' AFFF or TOG products.

128. Plaintiff William Stuart Walton is a resident and citizen of Scottsdale, Arizona. Plaintiff regularly used, and was thereby directly exposed to, AFFF and TOG in training and to extinguish fires during his working career as a military and/or civilian firefighter.

129. Plaintiff William Stuart Walton was diagnosed with prostate cancer as a result of exposure to Defendants' AFFF or TOG products.

130. Plaintiff Stephen Francis Walton is a resident and citizen of Jacksonville, North Carolina. Plaintiff regularly used, and was thereby directly exposed to, AFFF and TOG in training and to extinguish fires during his working career as a military and/or civilian firefighter.

131. Plaintiff Stephen Francis Walton was diagnosed with bladder cancer as a result of exposure to Defendants' AFFF or TOG products.

132. Plaintiff Harry Steven Ward is a resident and citizen of Jacksonville, Florida. Plaintiff regularly used, and was thereby directly exposed to, AFFF and TOG in training and to extinguish fires during his working career as a military and/or civilian firefighter.

133. Plaintiff Harry Steven Ward was diagnosed with prostate cancer as a result of exposure to Defendants' AFFF or TOG products.

134. Plaintiff Michael Shane Ward is a resident and citizen of Elon, North Carolina. Plaintiff regularly used, and was thereby directly exposed to, AFFF and TOG in training and to extinguish fires during his working career as a military and/or civilian firefighter.

135. Plaintiff Michael Shane Ward was diagnosed with prostate cancer as a result of exposure to Defendants' AFFF or TOG products.

136. Plaintiff Richard Wardlow Jr. is a resident and citizen of Edenton, North Carolina. Plaintiff regularly used, and was thereby directly exposed to, AFFF and TOG in training and to extinguish fires during his working career as a military and/or civilian firefighter.

137. Plaintiff Richard Wardlow Jr. was diagnosed with prostate cancer as a result of exposure to Defendants' AFFF or TOG products.

138. Plaintiff F. Carl Warner is a resident and citizen of Suffolk, Virginia. Plaintiff regularly used, and was thereby directly exposed to, AFFF and TOG in training and to extinguish fires during his working career as a military and/or civilian firefighter.

139. Plaintiff F. Carl Warner was diagnosed with prostate cancer as a result of exposure to Defendants' AFFF or TOG products.

140. Plaintiff Carlton Warren is a resident and citizen of Atlanta, Georgia. Plaintiff regularly used, and was thereby directly exposed to, AFFF and TOG in training and to extinguish fires during his working career as a military and/or civilian firefighter.

141. Plaintiff Carlton Warren was diagnosed with prostate cancer as a result of exposure to Defendants' AFFF or TOG products.

142. Plaintiff Charles Ray Warren is a resident and citizen of Jewett, Texas. Plaintiff regularly used, and was thereby directly exposed to, AFFF and TOG in training and to extinguish fires during his working career as a military and/or civilian firefighter.

143. Plaintiff Charles Ray Warren was diagnosed with bladder cancer as a result of exposure to Defendants' AFFF or TOG products.

144. Plaintiff Michael Wasilewski Sr. is a resident and citizen of Shamokin, Pennsylvania. Plaintiff regularly used, and was thereby directly exposed to, AFFF and TOG in training and to extinguish fires during his working career as a military and/or civilian firefighter.

145. Plaintiff Michael Wasilewski Sr. was diagnosed with prostate cancer as a result of exposure to Defendants' AFFF or TOG products.

146. Plaintiff David Lee Waters is a resident and citizen of Fortine, Montana. Plaintiff regularly used, and was thereby directly exposed to, AFFF and TOG in training and to extinguish fires during his working career as a military and/or civilian firefighter.

147. Plaintiff David Lee Waters was diagnosed with pancreatic cancer as a result of exposure to Defendants' AFFF or TOG products.

148. Plaintiff George Godfrey Watkins Jr. is a resident and citizen of Palm Coast, Florida. Plaintiff regularly used, and was thereby directly exposed to, AFFF and TOG in training and to extinguish fires during his working career as a military and/or civilian firefighter.

149. Plaintiff George Godfrey Watkins Jr. was diagnosed with prostate cancer as a result of exposure to Defendants' AFFF or TOG products.

150. Plaintiff Clarence Oren Weatherford is a resident and citizen of Lompoc, California. Plaintiff regularly used, and was thereby directly exposed to, AFFF and TOG in training and to extinguish fires during his working career as a military and/or civilian firefighter.

151. Plaintiff Clarence Oren Weatherford was diagnosed with bladder cancer as a result of exposure to Defendants' AFFF or TOG products.



152. Plaintiff Keith Randall Weatherford is a resident and citizen of Nacogdoches, Texas. Plaintiff regularly used, and was thereby directly exposed to, AFFF and TOG in training and to extinguish fires during his working career as a military and/or civilian firefighter.

153. Plaintiff Keith Randall Weatherford was diagnosed with prostate cancer as a result of exposure to Defendants' AFFF or TOG products.

154. Plaintiff Carl Clackley Weathers Jr is a resident and citizen of Lineville, Alabama. Plaintiff regularly used, and was thereby directly exposed to, AFFF and TOG in training and to extinguish fires during his working career as a military and/or civilian firefighter.

155. Plaintiff Carl Clackley Weathers Jr was diagnosed with prostate cancer as a result of exposure to Defendants' AFFF or TOG products.

156. Plaintiff Floyd Allan Webb is a resident and citizen of Waukesha, Wisconsin. Plaintiff regularly used, and was thereby directly exposed to, AFFF and TOG in training and to extinguish fires during his working career as a military and/or civilian firefighter.

157. Plaintiff Floyd Allan Webb was diagnosed with prostate cancer as a result of exposure to Defendants' AFFF or TOG products.

158. Plaintiff Joseph Edward Weber is a resident and citizen of Inver Grove Heights, Minnesota. Plaintiff regularly used, and was thereby directly exposed to, AFFF and TOG in training and to extinguish fires during his working career as a military and/or civilian firefighter.

159. Plaintiff Joseph Edward Weber was diagnosed with prostate cancer as a result of exposure to Defendants' AFFF or TOG products.

160. Plaintiff Willie Webster Jr. is a resident and citizen of Pittsburgh, Pennsylvania. Plaintiff regularly used, and was thereby directly exposed to, AFFF and TOG in training and to extinguish fires during his working career as a military and/or civilian firefighter.

161. Plaintiff Willie Webster Jr. was diagnosed with prostate cancer as a result of exposure to Defendants' AFFF or TOG products.

162. Plaintiff Roger Dale Wehrkamp is a resident and citizen of Seymour, Indiana. Plaintiff regularly used, and was thereby directly exposed to, AFFF and TOG in training and to extinguish fires during his working career as a military and/or civilian firefighter.

163. Plaintiff Roger Dale Wehrkamp was diagnosed with prostate cancer as a result of exposure to Defendants' AFFF or TOG products.

164. Plaintiff Jeffrey Charles Weir is a resident and citizen of Madison, Alabama. Plaintiff regularly used, and was thereby directly exposed to, AFFF and TOG in training and to extinguish fires during his working career as a military and/or civilian firefighter.

165. Plaintiff Jeffrey Charles Weir was diagnosed with prostate cancer as a result of exposure to Defendants' AFFF or TOG products.

166. Plaintiff Nelson Harlon Weirick is a resident and citizen of Wooster, Ohio. Plaintiff regularly used, and was thereby directly exposed to, AFFF and TOG in training and to extinguish fires during his working career as a military and/or civilian firefighter.

167. Plaintiff Nelson Harlon Weirick was diagnosed with prostate cancer as a result of exposure to Defendants' AFFF or TOG products.

168. Plaintiff Lawrence Bernard Weirum is a resident and citizen of Cascade, Idaho. Plaintiff regularly used, and was thereby directly exposed to, AFFF and TOG in training and to extinguish fires during his working career as a military and/or civilian firefighter.

169. Plaintiff Lawrence Bernard Weirum was diagnosed with prostate cancer as a result of exposure to Defendants' AFFF or TOG products.

170. Plaintiff Dwight Alden Weiss is a resident and citizen of Sterling, Nebraska. Plaintiff regularly used, and was thereby directly exposed to, AFFF and TOG in training and to extinguish fires during his working career as a military and/or civilian firefighter.

171. Plaintiff Dwight Alden Weiss was diagnosed with prostate cancer as a result of exposure to Defendants' AFFF or TOG products.

172. Plaintiff Charles Robert Weiss is a resident and citizen of New Hope, Pennsylvania. Plaintiff regularly used, and was thereby directly exposed to, AFFF and TOG in training and to extinguish fires during his working career as a military and/or civilian firefighter.

173. Plaintiff Charles Robert Weiss was diagnosed with prostate cancer as a result of exposure to Defendants' AFFF or TOG products.

174. Plaintiff Robert Thomas Welch is a resident and citizen of Dozier, Alabama. Plaintiff regularly used, and was thereby directly exposed to, AFFF and TOG in training and to extinguish fires during his working career as a military and/or civilian firefighter.

175. Plaintiff Robert Thomas Welch was diagnosed with prostate cancer as a result of exposure to Defendants' AFFF or TOG products.

176. Plaintiff Edwin Eugene Welch is a resident and citizen of Albany, Illinois. Plaintiff regularly used, and was thereby directly exposed to, AFFF and TOG in training and to extinguish fires during his working career as a military and/or civilian firefighter.

177. Plaintiff Edwin Eugene Welch was diagnosed with prostate cancer as a result of exposure to Defendants' AFFF or TOG products.

178. Plaintiff Michael Lynn Welch is a resident and citizen of Hackberry, Louisiana. Plaintiff regularly used, and was thereby directly exposed to, AFFF and TOG in training and to extinguish fires during his working career as a military and/or civilian firefighter.

179. Plaintiff Michael Lynn Welch was diagnosed with prostate cancer as a result of exposure to Defendants' AFFF or TOG products.

180. Plaintiff Ronald Eugene Wells Sr is a resident and citizen of Gilbert, Arizona. Plaintiff regularly used, and was thereby directly exposed to, AFFF and TOG in training and to extinguish fires during his working career as a military and/or civilian firefighter.

181. Plaintiff Ronald Eugene Wells Sr was diagnosed with prostate cancer as a result of exposure to Defendants' AFFF or TOG products.

182. Plaintiff Lawrence Edward Wells is a resident and citizen of Queensbury, New York. Plaintiff regularly used, and was thereby directly exposed to, AFFF and TOG in training and to extinguish fires during his working career as a military and/or civilian firefighter.

183. Plaintiff Lawrence Edward Wells was diagnosed with prostate cancer as a result of exposure to Defendants' AFFF or TOG products.

184. Plaintiff John H. Wells is a resident and citizen of Moira, New York. Plaintiff regularly used, and was thereby directly exposed to, AFFF and TOG in training and to extinguish fires during his working career as a military and/or civilian firefighter.

185. Plaintiff John H. Wells was diagnosed with prostate cancer as a result of exposure to Defendants' AFFF or TOG products.

186. Plaintiff Robert Owen Wells Jr is a resident and citizen of Brunswick, Ohio. Plaintiff regularly used, and was thereby directly exposed to, AFFF and TOG in training and to extinguish fires during his working career as a military and/or civilian firefighter.

187. Plaintiff Robert Owen Wells Jr was diagnosed with prostate cancer as a result of exposure to Defendants' AFFF or TOG products.

188. Plaintiff Gerard Louis Werrell is a resident and citizen of Cranford, New Jersey. Plaintiff regularly used, and was thereby directly exposed to, AFFF and TOG in training and to extinguish fires during his working career as a military and/or civilian firefighter.

189. Plaintiff Gerard Louis Werrell was diagnosed with prostate cancer as a result of exposure to Defendants' AFFF or TOG products.

190. Plaintiff Frederick Elmer Wesemann is a resident and citizen of Portland, Oregon. Plaintiff regularly used, and was thereby directly exposed to, AFFF and TOG in training and to extinguish fires during his working career as a military and/or civilian firefighter.

191. Plaintiff Frederick Elmer Wesemann was diagnosed with bladder cancer as a result of exposure to Defendants' AFFF or TOG products.

192. Plaintiff Aaron Lee Wesley is a resident and citizen of Natchez, Mississippi. Plaintiff regularly used, and was thereby directly exposed to, AFFF and TOG in training and to extinguish fires during his working career as a military and/or civilian firefighter.

193. Plaintiff Aaron Lee Wesley was diagnosed with prostate cancer as a result of exposure to Defendants' AFFF or TOG products.

194. Plaintiff Stephon Laven Wess is a resident and citizen of Muscle Shoals, Alabama. Plaintiff regularly used, and was thereby directly exposed to, AFFF and TOG in training and to extinguish fires during his working career as a military and/or civilian firefighter.

195. Plaintiff Stephon Laven Wess was diagnosed with prostate cancer as a result of exposure to Defendants' AFFF or TOG products.

196. Plaintiff William Loyd West is a resident and citizen of Woodville, Alabama. Plaintiff regularly used, and was thereby directly exposed to, AFFF and TOG in training and to extinguish fires during his working career as a military and/or civilian firefighter.

197. Plaintiff William Loyd West was diagnosed with prostate cancer as a result of exposure to Defendants' AFFF or TOG products.

198. Plaintiff James R. West is a resident and citizen of Laurel, Mississippi. Plaintiff regularly used, and was thereby directly exposed to, AFFF and TOG in training and to extinguish fires during his working career as a military and/or civilian firefighter.

199. Plaintiff James R. West was diagnosed with prostate cancer as a result of exposure to Defendants' AFFF or TOG products.

200. Plaintiff Craig Winston West Sr is a resident and citizen of Philadelphia, Pennsylvania. Plaintiff regularly used, and was thereby directly exposed to, AFFF and TOG in training and to extinguish fires during his working career as a military and/or civilian firefighter.

201. Plaintiff Craig Winston West Sr was diagnosed with prostate cancer as a result of exposure to Defendants' AFFF or TOG products.

202. Plaintiff David Carlton Westfield is a resident and citizen of Los Angeles, California. Plaintiff regularly used, and was thereby directly exposed to, AFFF and TOG in training and to extinguish fires during his working career as a military and/or civilian firefighter.

203. Plaintiff David Carlton Westfield was diagnosed with bladder cancer as a result of exposure to Defendants' AFFF or TOG products.

204. Plaintiff David Joseph Wetzel is a resident and citizen of Boynton Beach, Florida. Plaintiff regularly used, and was thereby directly exposed to, AFFF and TOG in training and to extinguish fires during his working career as a military and/or civilian firefighter.

205. Plaintiff David Joseph Wetzel was diagnosed with prostate cancer as a result of exposure to Defendants' AFFF or TOG products.

206. Plaintiff Thomas Jerold Wheatley is a resident and citizen of Happy Valley, Oregon. Plaintiff regularly used, and was thereby directly exposed to, AFFF and TOG in training and to extinguish fires during his working career as a military and/or civilian firefighter.

207. Plaintiff Thomas Jerold Wheatley was diagnosed with liver cancer as a result of exposure to Defendants' AFFF or TOG products.

208. Plaintiff Gregory Wheeless is a resident and citizen of Brooklyn, New York. Plaintiff regularly used, and was thereby directly exposed to, AFFF and TOG in training and to extinguish fires during his working career as a military and/or civilian firefighter.

209. Plaintiff Gregory Wheeless was diagnosed with prostate cancer as a result of exposure to Defendants' AFFF or TOG products.

210. Plaintiff Carl Lory Whitaker Jr is a resident and citizen of Lake Havasu City, Arizona. Plaintiff regularly used, and was thereby directly exposed to, AFFF and TOG in training and to extinguish fires during his working career as a military and/or civilian firefighter.

211. Plaintiff Carl Lory Whitaker Jr was diagnosed with prostate cancer as a result of exposure to Defendants' AFFF or TOG products.

212. Plaintiff Daniel Clark White is a resident and citizen of Mount Shasta, California. Plaintiff regularly used, and was thereby directly exposed to, AFFF and TOG in training and to extinguish fires during his working career as a military and/or civilian firefighter.

213. Plaintiff Daniel Clark White was diagnosed with prostate cancer as a result of exposure to Defendants' AFFF or TOG products.

214. Plaintiff Robert Edward White is a resident and citizen of Rantoul, Illinois. Plaintiff regularly used, and was thereby directly exposed to, AFFF and TOG in training and to extinguish fires during his working career as a military and/or civilian firefighter.

215. Plaintiff Robert Edward White was diagnosed with prostate cancer as a result of exposure to Defendants' AFFF or TOG products.

216. Plaintiff Kevin Eugene White is a resident and citizen of Osage Beach, Missouri. Plaintiff regularly used, and was thereby directly exposed to, AFFF and TOG in training and to extinguish fires during his working career as a military and/or civilian firefighter.

217. Plaintiff Kevin Eugene White was diagnosed with bladder cancer as a result of exposure to Defendants' AFFF or TOG products.

218. Plaintiff Frank Edward White Sr. is a resident and citizen of Houston, Texas. Plaintiff regularly used, and was thereby directly exposed to, AFFF and TOG in training and to extinguish fires during his working career as a military and/or civilian firefighter.

219. Plaintiff Frank Edward White Sr. was diagnosed with prostate cancer as a result of exposure to Defendants' AFFF or TOG products.

220. Plaintiff Michael Joseph White is a resident and citizen of Huntington, West Virginia. Plaintiff regularly used, and was thereby directly exposed to, AFFF and TOG in training and to extinguish fires during his working career as a military and/or civilian firefighter.

221. Plaintiff Michael Joseph White was diagnosed with prostate cancer as a result of exposure to Defendants' AFFF or TOG products.

222. Plaintiff Garnell Wilborn Whitfield Jr. is a resident and citizen of Buffalo, New York. Plaintiff regularly used, and was thereby directly exposed to, AFFF and TOG in training and to extinguish fires during his working career as a military and/or civilian firefighter.

223. Plaintiff Garnell Wilborn Whitfield Jr. was diagnosed with prostate cancer as a result of exposure to Defendants' AFFF or TOG products.



224. Plaintiff Ronald James Whiting is a resident and citizen of Santaquin, Utah. Plaintiff regularly used, and was thereby directly exposed to, AFFF and TOG in training and to extinguish fires during his working career as a military and/or civilian firefighter.

225. Plaintiff Ronald James Whiting was diagnosed with prostate cancer as a result of exposure to Defendants' AFFF or TOG products.

226. Plaintiff Karl Allen Whitt is a resident and citizen of Marion, Ohio. Plaintiff regularly used, and was thereby directly exposed to, AFFF and TOG in training and to extinguish fires during his working career as a military and/or civilian firefighter.

227. Plaintiff Karl Allen Whitt was diagnosed with prostate cancer as a result of exposure to Defendants' AFFF or TOG products.

228. Plaintiff Steven Douglas Wilcox is a resident and citizen of Canadian Lake, Michigan. Plaintiff regularly used, and was thereby directly exposed to, AFFF and TOG in training and to extinguish fires during his working career as a military and/or civilian firefighter.

229. Plaintiff Steven Douglas Wilcox was diagnosed with bladder cancer as a result of exposure to Defendants' AFFF or TOG products.

230. Plaintiff Richard Allan Wilcox is a resident and citizen of Port Jefferson Station, New York. Plaintiff regularly used, and was thereby directly exposed to, AFFF and TOG in training and to extinguish fires during his working career as a military and/or civilian firefighter.

231. Plaintiff Richard Allan Wilcox was diagnosed with prostate cancer as a result of exposure to Defendants' AFFF or TOG products.

232. Plaintiff Maxie Douglas Wilkinson is a resident and citizen of Lawtey, Florida. Plaintiff regularly used, and was thereby directly exposed to, AFFF and TOG in training and to extinguish fires during his working career as a military and/or civilian firefighter.

233. Plaintiff Maxie Douglas Wilkinson was diagnosed with prostate cancer as a result of exposure to Defendants' AFFF or TOG products.

234. Plaintiff Arthur Williams is a resident and citizen of Birmingham, Alabama. Plaintiff regularly used, and was thereby directly exposed to, AFFF and TOG in training and to extinguish fires during his working career as a military and/or civilian firefighter.

235. Plaintiff Arthur Williams was diagnosed with prostate cancer as a result of exposure to Defendants' AFFF or TOG products.

236. Plaintiff Gerald Edward Williams is a resident and citizen of Hartford, Alabama. Plaintiff regularly used, and was thereby directly exposed to, AFFF and TOG in training and to extinguish fires during his working career as a military and/or civilian firefighter.

237. Plaintiff Gerald Edward Williams was diagnosed with prostate cancer as a result of exposure to Defendants' AFFF or TOG products.

238. Plaintiff Wayne Williams is a resident and citizen of Falkville, Alabama. Plaintiff regularly used, and was thereby directly exposed to, AFFF and TOG in training and to extinguish fires during his working career as a military and/or civilian firefighter.

239. Plaintiff Wayne Williams was diagnosed with prostate cancer as a result of exposure to Defendants' AFFF or TOG products.

240. Plaintiff Jeffrey Scott Young is a resident and citizen of Sylvania, Ohio. Plaintiff regularly used, and was thereby directly exposed to, AFFF and TOG in training and to extinguish fires during his working career as a military and/or civilian firefighter.

241. Plaintiff Jeffrey Scott Young was diagnosed with prostate cancer as a result of exposure to Defendants' AFFF or TOG products.

242. Plaintiff Robert Allen Young is a resident and citizen of Spartanburg, South Carolina. Plaintiff regularly used, and was thereby directly exposed to, AFFF and TOG in training and to extinguish fires during his working career as a military and/or civilian firefighter.

243. Plaintiff Robert Allen Young was diagnosed with prostate cancer as a result of exposure to Defendants' AFFF or TOG products.

244. Plaintiff George Yuhas is a resident and citizen of Stratford, Oklahoma. Plaintiff regularly used, and was thereby directly exposed to, AFFF and TOG in training and to extinguish fires during his working career as a military and/or civilian firefighter.

245. Plaintiff George Yuhas was diagnosed with prostate cancer as a result of exposure to Defendants' AFFF or TOG products.

246. Plaintiff Wayne Richard Zamagne is a resident and citizen of Kila, Montana. Plaintiff regularly used, and was thereby directly exposed to, AFFF and TOG in training and to extinguish fires during his working career as a military and/or civilian firefighter.

247. Plaintiff Wayne Richard Zamagne was diagnosed with prostate cancer as a result of exposure to Defendants' AFFF or TOG products.

248. Plaintiff Mario LeeRoy Zamora Sr is a resident and citizen of Carrizozo, New Mexico. Plaintiff regularly used, and was thereby directly exposed to, AFFF and TOG in training and to extinguish fires during his working career as a military and/or civilian firefighter.

249. Plaintiff Mario LeeRoy Zamora Sr was diagnosed with bladder cancer as a result of exposure to Defendants' AFFF or TOG products.

250. Plaintiff James Wilfred Zeirke is a resident and citizen of Sussex, Wisconsin. Plaintiff regularly used, and was thereby directly exposed to, AFFF and TOG in training and to extinguish fires during his working career as a military and/or civilian firefighter.

251. Plaintiff James Wilfred Zeirke was diagnosed with bladder cancer as a result of exposure to Defendants' AFFF or TOG products.

252. Plaintiff David Allen Zietlow is a resident and citizen of El Cajon, California. Plaintiff regularly used, and was thereby directly exposed to, AFFF and TOG in training and to extinguish fires during his working career as a military and/or civilian firefighter.

253. Plaintiff David Allen Zietlow was diagnosed with prostate cancer as a result of exposure to Defendants' AFFF or TOG products.

254. Plaintiff Michael Ray Zimmerman is a resident and citizen of Marysville, Washington. Plaintiff regularly used, and was thereby directly exposed to, AFFF and TOG in training and to extinguish fires during his working career as a military and/or civilian firefighter.

255. Plaintiff Michael Ray Zimmerman was diagnosed with prostate cancer as a result of exposure to Defendants' AFFF or TOG products.

256. Plaintiff Thomas John Zurawski is a resident and citizen of Whiting, Indiana. Plaintiff regularly used, and was thereby directly exposed to, AFFF and TOG in training and to extinguish fires during his working career as a military and/or civilian firefighter.

257. Plaintiff Thomas John Zurawski was diagnosed with prostate cancer as a result of exposure to Defendants' AFFF or TOG products.

258. Plaintiff Robert J. Zdzinicki is a resident and citizen of Stafford, Virginia. Plaintiff regularly used, and was thereby directly exposed to, AFFF and TOG in training and to extinguish fires during his working career as a military and/or civilian firefighter.

259. Plaintiff Robert J. Zdzinicki was diagnosed with kidney cancer as a result of exposure to Defendants' AFFF or TOG products.

260. Defendants are designers, marketers, developers, manufacturers, distributors, releasers, instructors, promoters and sellers of PFAS-containing AFFF products or underlying PFAS containing chemicals used in AFFF production. The following Defendants, at all times relevant to this lawsuit, manufactured, designed, marketed, distributed, released, instructed, promoted and/or otherwise sold (directly or indirectly) PFAS-containing AFFF products to various locations for use in fighting Class B fires such that each Defendant knew or should have known said products would be delivered to areas for active use by Plaintiffs during the course of training and firefighting activities.

261. Defendant, 3M Company, f/k/a Minnesota Mining and Manufacturing Company, (“3M”), is a Delaware corporation and does business throughout the United States. 3M has its principal place of business at 3M Center, St. Paul, Minnesota 55133.

262. 3M designed, marketed, developed, manufactured, distributed, released, trained users, produced instructional materials, promoted, sold and/or otherwise handled and/or used AFFF containing PFAS that are used in firefighting training and response exercises which are the subject of this Complaint. Further, defendant designed, marketed, developed, manufactured, distributed, released, trained users, produced instructional materials, promoted, sold and/or otherwise handled and/or used underlying chemicals and/or products added to AFFF which contained PFAS for use in firefighting.

263. Defendant AGC Chemicals Americas, Inc. (“AGC”) is a Delaware corporation and does business throughout the United States. AGC has its principal place of business at 55 E. Uwchlan Ave., Suite 201, Exton, Pennsylvania 19341.

264. AGC designed, marketed, developed, manufactured, distributed, released, trained users, produced instructional materials, promoted, sold and/or otherwise handled and/or used AFFF

containing PFAS that are used in firefighting training and response exercises which are the subject of this Complaint. Further, defendant designed, marketed, developed, manufactured, distributed, released, trained users, produced instructional materials, promoted, sold and/or otherwise handled and/or used underlying chemicals and/or products added to AFFF which contained PFAS for use in firefighting.

265. Defendant Amerex Corporation (“Amerex”) is an Alabama corporation and does business throughout the United States. Amerex has its principal place of business at 7595 Gadsden Highway, Trussville, Alabama 35173.

266. Amerex designed, marketed, developed, manufactured, distributed, released, trained users, produced instructional materials, promoted, sold and/or otherwise handled and/or used AFFF containing PFAS that are used in firefighting training and response exercises which are the subject of this Complaint. Further, defendant designed, marketed, developed, manufactured, distributed, released, trained users, produced instructional materials, promoted, sold and/or otherwise handled and/or used underlying chemicals and/or products added to AFFF which contained PFAS for use in firefighting.

267. Defendant Archroma U.S. Inc. (“Archroma”) is a North Carolina company and does business throughout the United States. Archroma has its principal place of business at 5435 77 Center Drive, #10 Charlotte, North Carolina 28217. Upon information and belief, Archroma was formed in 2013 as part of the acquisition of Clariant Corporation’s Textile Chemicals, Paper Specialties and Emulsions business by SK Capital Partners.

268. Archroma designed, marketed, developed, manufactured, distributed, released, trained users, produced instructional materials, promoted, sold and/or otherwise handled and/or used AFFF containing PFAS that are used in firefighting training and response exercises which are the

subject of this Complaint. Further, defendant designed, marketed, developed, manufactured, distributed, released, trained users, produced instructional materials, promoted, sold and/or otherwise handled and/or used underlying chemicals and/or products added to AFFF which contained PFAS for use in firefighting.

269. Defendant Arkema, Inc. (“Arkema”) is a Pennsylvania corporation and does business throughout the United States. Arkema has its principal place of business at 900 1<sup>st</sup> Avenue, King of Prussia, Pennsylvania 19406. Upon information and belief, assets of Arkema’s fluorochemical business were purchased by Defendant Dupont in 2002.

270. Arkema designed, marketed, developed, manufactured, distributed, released, trained users, produced instructional materials, promoted, sold and/or otherwise handled and/or used AFFF containing PFAS that are used in firefighting training and response exercises which are the subject of this Complaint. Further, defendant designed, marketed, developed, manufactured, distributed, released, trained users, produced instructional materials, promoted, sold and/or otherwise handled and/or used underlying chemicals and/or products added to AFFF which contained PFAS for use in firefighting.

271. Defendant Buckeye Fire Equipment Company (“Buckeye”) is an Ohio corporation and does business throughout the United States. Buckeye has its principal place of business at 110 Kings Road, Mountain, North Carolina 28086.

272. Buckeye designed, marketed, developed, manufactured, distributed, released, trained users, produced instructional materials, sold and/or otherwise handled and/or used AFFF containing PFAS that are used in firefighting training and response exercises which are the subject of this Complaint. Further, defendant designed, marketed, developed, manufactured, distributed, released, trained users, produced instructional materials, promoted, sold and/or otherwise handled

and/or used underlying chemicals and/or products added to AFFF which contained PFAS for use in firefighting.

273. Defendant Carrier Global Corporation (“Carrier”) is a Delaware corporation and does business throughout the United States. Carrier has its principal place of business at 13995 Pasteur Boulevard, Palm Beach Gardens, Florida 33418. Upon information and belief, Carrier was formed in 2020 and is the parent company of Kidde-Fenwal, Inc., a manufacturer of AFFF.

274. Carrier designed, marketed, developed, manufactured, distributed, released, trained users, produced instructional materials, promoted, sold and/or otherwise handled and/or used AFFF containing PFAS that are used in firefighting training and response exercises which are the subject of this Complaint. Further, defendant designed, marketed, developed, manufactured, distributed, released, trained users, produced instructional materials, promoted, sold and/or otherwise handled and/or used underlying chemicals and/or products added to AFFF which contained PFAS for use in firefighting.

275. Defendant ChemDesign Products, Inc. (“ChemDesign”) is a Texas corporation and does business throughout the United States. ChemDesign has its principal place of business at 2 Stanton Street, Marinette, Wisconsin 54143.

276. ChemDesign designed, marketed, developed, manufactured, distributed, released, trained users, produced instructional materials, promoted, sold and/or otherwise handled and/or used AFFF containing PFAS that are used in firefighting training and response exercises which are the subject of this Complaint. Further, defendant designed, marketed, developed, manufactured, distributed, released, trained users, produced instructional materials, promoted, sold and/or otherwise handled and/or used underlying chemicals and/or products added to AFFF which contained PFAS for use in firefighting.



277. Defendant Chemguard, Inc. (“Chemguard”) is a Wisconsin corporation and does business throughout the United States. Chemguard has its principal place of business at One Stanton Street, Marinette, Wisconsin 54143.

278. Chemguard designed, marketed, developed, manufactured, distributed, released, trained users, produced instructional materials, sold and/or otherwise handled and/or used AFFF containing PFAS that are used in firefighting training and response exercises which are the subject of this Complaint. Further, defendant designed, marketed, developed, manufactured, distributed, released, trained users, produced instructional materials, promoted, sold and/or otherwise handled and/or used underlying chemicals and/or products added to AFFF which contained PFAS for use in firefighting.

279. Defendant Chemicals, Inc. (“Chemicals”) is a Texas corporation and does business throughout the United States. Chemicals has its principal place of business at 12321 Hatcherville Road, Baytown, Texas 77521.

280. Chemicals designed, marketed, developed, manufactured, distributed, released, trained users, produced instructional materials, promoted, sold and/or otherwise handled and/or used AFFF containing PFAS that are used in firefighting training and response exercises which are the subject of this Complaint. Further, defendant designed, marketed, developed, manufactured, distributed, released, trained users, produced instructional materials, promoted, sold and/or otherwise handled and/or used underlying chemicals and/or products added to AFFF which contained PFAS for use in firefighting.

281. Defendant Chemours Company FC, LLC (“Chemours FC”), is a Delaware corporation and does business throughout the United States. Chemours has its principal place of business at 1007

Market Street, Wilmington, Delaware 19899. Chemours FC is a subsidiary of The Chemours Company.

282. Chemours FC designed, marketed, developed, manufactured, distributed, released, trained users, produced instructional materials, sold, and/or otherwise handled and/or used AFFF containing PFAS that are the subject of this Complaint. Further, defendant designed, marketed, developed, manufactured, distributed, released, trained users, produced instructional materials, promoted, sold and/or otherwise handled and/or used underlying chemicals and/or products added to AFFF which contained PFAS for use in firefighting.

283. Defendant Clariant Corporation (“Clariant”) is a New York corporation and does business throughout the United States. Clariant has its principal place of business at 4000 Monroe Road, Charlotte, North Carolina 28205.

284. Clariant designed, marketed, developed, manufactured, distributed, released, trained users, produced instructional materials, promoted, sold and/or otherwise handled and/or used AFFF containing PFAS that are used in firefighting training and response exercises which are the subject of this Complaint. Further, defendant designed, marketed, developed, manufactured, distributed, released, trained users, produced instructional materials, promoted, sold and/or otherwise handled and/or used underlying chemicals and/or products added to AFFF which contained PFAS for use in firefighting.

285. Defendant Corteva, Inc. (“Corteva”) is a Delaware Corporation that conducts business throughout the United States. Its principal place of business is Chestnut Run Plaza 735, Wilmington, Delaware 19805. Corteva is the successor-in-interest to Dupont Chemical Solutions Enterprise.

286. Corteva designed, marketed, developed, manufactured, distributed, released, trained users, produced instructional materials, sold, and/or otherwise handled and/or used AFFF containing PFAS that are the subject of this Complaint. Further, defendant designed, marketed, developed, manufactured, distributed, released, trained users, produced instructional materials, promoted, sold and/or otherwise handled and/or used underlying chemicals and/or products added to AFFF which contained PFAS for use in firefighting.

287. Defendant Deepwater Chemicals, Inc. (“Deepwater”) is a Delaware corporation and does business throughout the United States. Deepwater’s principal place of business is at 196122 E County Road 735, Woodward, Oklahoma 73801.

288. Deepwater designed, marketed, developed, manufactured, distributed, released, trained users, produced instructional materials, promoted, sold and/or otherwise handled and/or used AFFF containing PFAS that are used in firefighting training and response exercises which are the subject of this Complaint. Further, defendant designed, marketed, developed, manufactured, distributed, released, trained users, produced instructional materials, promoted, sold and/or otherwise handled and/or used underlying chemicals and/or products added to AFFF which contained PFAS for use in firefighting.

289. Defendant Du Pont de Nemours Inc. (f/k/a DowDuPont, Inc.) (“DowDuPont”), is a Delaware corporation and does business throughout the United States. DowDuPont, has its principal place of business at 1007 Market Street, Wilmington, Delaware 19899 and 2211 H.H. Dow Way, Midland, Michigan 48674. DowDupont was created in 2015 to transfer Chemours and DuPont liabilities for manufacturing and distributing fluorosurfactants to AFFF manufacturers.

290. DowDuPont designed, marketed, developed, manufactured, distributed, released, trained users, produced instructional materials, sold, and/or otherwise handled and/or used AFFF

containing PFAS that are the subject of this Complaint. Further, defendant designed, marketed, developed, manufactured, distributed, released, trained users, produced instructional materials, promoted, sold and/or otherwise handled and/or used underlying chemicals and/or products added to AFFF which contained PFAS for use in firefighting.

291. Defendant Dynax Corporation (“Dynax”) is a New York corporation that conducts business throughout the United States. Its principal place of business is 103 Fairview Park Drive, Elmsford, New York, 10523-1544.

292. Dynax designed, marketed, developed, manufactured, distributed, released, trained users, produced instructional materials, sold, and/or otherwise handled and/or used AFFF containing PFAS that are the subject of this Complaint. Further, defendant designed, marketed, developed, manufactured, distributed, released, trained users, produced instructional materials, promoted, sold and/or otherwise handled and/or used underlying chemicals and/or products added to AFFF which contained PFAS for use in firefighting.

293. Defendant E. I. du Pont de Nemours and Company (“DuPont”), is a Delaware corporation and does business throughout the United States. DuPont has its principal place of business at 1007 Market Street, Wilmington, Delaware 19898.

294. DuPont designed, marketed, developed, manufactured, distributed, released, trained users, produced instructional materials, sold, and/or otherwise handled and/or used AFFF containing PFAS that are the subject of this Complaint. Further, defendant designed, marketed, developed, manufactured, distributed, released, trained users, produced instructional materials, promoted, sold and/or otherwise handled and/or used underlying chemicals and/or products added to AFFF which contained PFAS for use in firefighting.

295. Defendant Kidde-Fenwal, Inc. (“Kidde-Fenwal”) is a corporation organized under the laws of the State of Delaware and does business throughout the United States. Kidde-Fenwal has its principal place of business at One Financial Plaza, Hartford, Connecticut 06101. Kidde-Fenwal is the successor-in-interest to Kidde Fire Fighting, Inc. (f/k/a Chubb National Foam, Inc. f/k/a National Foam System, Inc.) (collectively, “Kidde/Kidde Fire”).

296. Kidde-Fenwal designed, marketed, developed, manufactured, distributed, released, trained users, produced instructional materials, sold, and/or otherwise handled and/or used AFFF containing PFAS that are the subject of this Complaint. Further, defendant designed, marketed, developed, manufactured, distributed, released, trained users, produced instructional materials, promoted, sold and/or otherwise handled and/or used underlying chemicals and/or products added to AFFF which contained PFAS for use in firefighting.

297. Defendant Kidde P.L.C., Inc. (“Kidde P.L.C.”) is a foreign corporation organized and existing under the laws of the State of Delaware and does business throughout the United States. Kidde P.L.C. has its principal place of business at One Carrier Place, Farmington, Connecticut 06034. Upon information and belief, Kidde PLC was formerly known as Williams Holdings, Inc. and/or Williams US, Inc.

298. Kidde P.L.C. designed, marketed, developed, manufactured, distributed, released, trained users, produced instructional materials, sold, and/or otherwise handled and/or used AFFF containing PFAS that are the subject of this Complaint. Further, defendant designed, marketed, developed, manufactured, distributed, released, trained users, produced instructional materials, promoted, sold and/or otherwise handled and/or used underlying chemicals and/or products added to AFFF which contained PFAS for use in firefighting.

299. Defendant Nation Ford Chemical Company (“Nation Ford”) is a South Carolina company and does business throughout the United States. Nation Ford has its principal place of business at 2300 Banks Street, Fort Mill, South Carolina 29715.

300. Nation Ford designed, marketed, developed, manufactured, distributed, released, trained users, produced instructional materials, sold, and/or otherwise handled and/or used AFFF containing PFAS that are the subject of this Complaint. Further, defendant designed, marketed, developed, manufactured, distributed, released, trained users, produced instructional materials, promoted, sold and/or otherwise handled and/or used underlying chemicals and/or products added to AFFF which contained PFAS for use in firefighting.

301. Defendant National Foam, Inc. (“National Foam”) is a Delaware corporation and does business throughout the United States. National Foam has its principal place of business at 141 Junny Road, Angier, North Carolina, 27501.

302. National Foam designed, marketed, developed, manufactured, distributed, released, trained users, produced instructional materials, sold and/or otherwise handled and/or used AFFF containing PFAS that are used in firefighting training and response exercises which are the subject of this Complaint. Further, defendant designed, marketed, developed, manufactured, distributed, released, trained users, produced instructional materials, promoted, sold and/or otherwise handled and/or used underlying chemicals and/or products added to AFFF which contained PFAS for use in firefighting.

303. Defendant The Chemours Company (“Chemours”), is a Delaware corporation and does business throughout the United States. Chemours has its principal place of business 1007 Market Street, Wilmington, Delaware 19898. Upon information and belief, Chemours was spun off from DuPont in 2015 to assume PFAS related liabilities.

304. Chemours designed, marketed, developed, manufactured, distributed, released, trained users, produced instructional materials, sold, and/or otherwise handled and/or used AFFF containing PFAS that are the subject of this Complaint. Further, defendant designed, marketed, developed, manufactured, distributed, released, trained users, produced instructional materials, promoted, sold and/or otherwise handled and/or used underlying chemicals and/or products added to AFFF which contained PFAS for use in firefighting.

305. Defendant Tyco Fire Products, LP, as successor-in-interest to The Ansul Company (“Tyco”), is a Delaware limited partnership and does business throughout the United States. Tyco has its principal place of business at 1400 Pennbrook Parkway, Lansdale, Pennsylvania 19466. Tyco manufactured and currently manufactures the Ansul brand of products, including Ansul brand AFFF containing PFAS.

306. Tyco is the successor in interest to the corporation formerly known as The Ansul Company (“Ansul”). At all times relevant, Tyco/Ansul designed, marketed, developed, manufactured, distributed released, trained users, produced instructional materials, sold and/or otherwise handled and/or used AFFF containing PFAS that are used in firefighting training and response exercises which are the subject of this Complaint. Further, defendant designed, marketed, developed, manufactured, distributed, released, trained users, produced instructional materials, promoted, sold and/or otherwise handled and/or used underlying chemicals and/or products added to AFFF which contained PFAS for use in firefighting.

307. Defendant United Technologies Corporation (“United Technologies”) is a foreign corporation organized and existing under the laws of the State of Delaware and does business throughout the United States. United Technologies has its principal place of business at 8 Farm Springs Road, Farmington, Connecticut 06032.

308. United Technologies designed, marketed, developed, manufactured, distributed, released, trained users, produced instructional materials, sold, and/or otherwise handled and/or used AFFF containing PFAS that are the subject of this Complaint. Further, defendant designed, marketed, developed, manufactured, distributed, released, trained users, produced instructional materials, promoted, sold and/or otherwise handled and/or used underlying chemicals and/or products added to AFFF which contained PFAS for use in firefighting.

309. Defendant UTC Fire & Security Americas Corporation, Inc. (f/k/a GE Interlogix, Inc.) (“UTC”) is a North Carolina corporation and does business throughout the United States. UTC has principal place of business at 3211 Progress Drive, Lincolnton, North Carolina 28092. Upon information and belief, Kidde-Fenwal, Inc. is part of the UTC Climate Control & Security unit of United Technologies Corporation.

310. UTC designed, marketed, developed, manufactured, distributed, released, trained users, produced instructional materials, sold, and/or otherwise handled and/or used AFFF containing PFAS that are the subject of this Complaint. Further, defendant designed, marketed, developed, manufactured, distributed, released, trained users, produced instructional materials, promoted, sold and/or otherwise handled and/or used underlying chemicals and/or products added to AFFF which contained PFAS for use in firefighting.

311. Defendant Allstar Fire Equipment is a California corporation (“Allstar”) and does business throughout the United States. Allstar has its principal place of business at 12328 Lower Azusa Road, Arcadia, California 91006.

312. Allstar developed, manufactured, marketed, distributed, released, sold, and/or used PFAS, PFAS materials, and products containing PFAS in turnout gear for use in firefighting.



313. Defendant Fire-Dex, LLC (“Fire-Dex”) is a Delaware corporation and does business throughout the United States. Fire-Dex has its principal place of business at 780 South Progress Drive, Medina, Ohio 44256.

314. Fire-Dex developed, manufactured, marketed, distributed, released, sold, and/or used PFAS, PFAS materials, and products containing PFAS in turnout gear for use in firefighting.

315. Defendant Globe Manufacturing Company LLC (“Globe”) is a New Hampshire corporation and does business throughout the United States. Globe has its principal place of business at 37 Loudon Road, Pittsfield, New Hampshire 03263.

316. Globe developed, manufactured, marketed, distributed, released, sold, and/or used PFAS, PFAS materials, and products containing PFAS in turnout gear for use in firefighting.

317. Defendant Honeywell Safety Products USA, Inc. (“Honeywell”) is a Delaware corporation and does business throughout the United States. Honeywell has its principal place of business at 300 South Tryon Street Suite 500, Charlotte, North Carolina 28202.

318. Honeywell developed, manufactured, marketed, distributed, released, sold, and/or used PFAS, PFAS materials, and products containing PFAS in turnout gear for use in firefighting.

319. Defendant Lion Group, Inc. (“Lion”) is an Ohio corporation and does business throughout the United States. Lion has its principal place of business at 7200 Poe Avenue, Suite 400 Dayton, Ohio, 45414.

320. Lion developed, manufactured, marketed, distributed, released, sold, and/or used PFAS, PFAS materials, and products containing PFAS in turnout gear for use in firefighting.

321. Defendant Mallory Safety and Supply LLC. (“Mallory”) is a Washington corporation and does business throughout the United States. Mallory has its principal place of business at 1040 Industrial Way, Longview, Washington, 98632.

322. Mallory developed, manufactured, marketed, distributed, released, sold, and/or used PFAS, PFAS materials, and products containing PFAS in turnout gear for use in firefighting.

323. Defendant Mine Safety Appliances Co., Inc. (“MSA”) is a Pennsylvania corporation and does business throughout the United States. MSA has its principal place of business at 1000 Cranberry Woods Drive, Cranberry Township, Pennsylvania, 16066.

324. MSA developed, manufactured, marketed, distributed, released, sold, and/or used PFAS, PFAS materials, and products containing PFAS in turnout gear for use in firefighting.

325. Defendant Municipal Emergency Services, Inc. (“MES”) is a Nevada corporation and does business throughout the United States. MES has its principal place of business at 12 Turnberry Lane, Sandy Hook, Connecticut 06482.

326. MES developed, manufactured, marketed, distributed, released, sold, and/or used PFAS, PFAS materials, and products containing PFAS in turnout gear for use in firefighting.

327. Defendant PBI Performance Products, Inc. (“PBI”) is a Delaware corporation and does business throughout the United States. PBI has its principal place of business at 9800-D Southern Pine Boulevard, Charlotte, North Carolina 28273.

328. PBI developed, manufactured, marketed, distributed, released, sold, and/or used PFAS, PFAS materials, and products containing PFAS in turnout gear for use in firefighting.

329. Defendant Southern Mills, Inc. (“Southern Mills”) is a Georgia corporation and does business throughout the United States. Southern Mills has its principal place of business at 6501 Mall Boulevard, Union City, Georgia 30291.

330. Southern Mills developed, manufactured, marketed, distributed, released, sold, and/or used PFAS, PFAS materials, and products containing PFAS in turnout gear for use in firefighting.

331. Defendant Stedfast USA, Inc. (“Stedfast”) is a Delaware corporation and does business throughout the United States. Stedfast has its principal place of business at 800 Mountain View Drive, Piney Flats, Tennessee 37686.

332. Stedfast developed, manufactured, marketed, distributed, released, sold, and/or used PFAS, PFAS materials, and products containing PFAS in turnout gear for use in firefighting.

333. Defendant W.L. Gore & Associates Inc. (“Gore”) is a Delaware corporation and does business throughout the United States. Gore has its principal place of business at 1901 Barksdale Road, Newark, Delaware 19711.

334. Gore developed, manufactured, marketed, distributed, released, sold, and/or used PFAS, PFAS materials, and products containing PFAS in turnout gear for use in firefighting.

335. When reference is made in this Complaint to any act or omission of any of the Defendants, it shall be deemed that the officers, directors, agents, employees, or representatives of the Defendants committed or authorized such act or omission, or failed to adequately supervise or properly control or direct their employees while engaged in the management, direction, operation, or control of the affairs of Defendants, and did so while acting within the scope of their duties, employment or agency.

336. The term “AFFF Defendant” or “AFFF Defendants” refers to all Defendants named herein who designed, marketed, developed, manufactured, distributed, released, trained users, produced instructional materials, promoted, sold and/or otherwise handled and/or used AFFF containing PFAS that are used in firefighting training and response exercises which are the subject of this Complaint. jointly and severally, unless otherwise stated.

337. The term “TOG Defendant” or “TOG Defendants” refers to all Defendants names herein who developed, manufactured, marketed, distributed, released, sold, and/or used PFAS, PFAS materials, and products containing PFAS in turnout gear for use in firefighting.

### **FACTUAL ALLEGATIONS**

338. Aqueous Film-Forming Foam (“AFFF”) is a combination of chemicals used to extinguish hydrocarbon fuel-based fires.

339. AFFF-containing fluorinated surfactants have better firefighting capabilities than water due to their surfactant-tension lowering properties which allow the compound(s) to extinguish fire by smothering, ultimately starving it of oxygen.

340. AFFF is a Class-B firefighting foam. It is mixed with water and used to extinguish fires that are difficult to fight, particularly those that involve petroleum or other flammable liquids.

341. AFFF Defendants designed, marketed, developed, manufactured, distributed, released, trained users, produced instructional materials, promoted, sold, and/or otherwise handled AFFF containing toxic PFAS or underlying PFAS containing chemicals used in AFFF production that were used by entities around the country, including military, county, and municipal firefighting departments.

342. AFFF Defendants have each designed, marketed, developed, manufactured, distributed, released, trained users on, produced instructional materials for, sold, and/or otherwise handled and/or used AFFF containing PFAS, in such a way as to cause the contamination of Plaintiffs’ blood and/or body with PFAS, and the resultant biopersistence and bioaccumulation of such PFAS in the blood and/or body of Plaintiffs.

343. AFFF was introduced commercially in the mid-1960s and rapidly became the primary firefighting foam in the United States and in other parts of the world. It contains PFAS, which are highly fluorinated synthetic chemical compounds whose family include PFOS and PFOA.

344. PFAS are a family of chemical compounds containing fluorine and carbon atoms.

345. PFAS have been used for decades in the manufacture of AFFF. The PFAS family of chemicals are entirely human-made and do not naturally occur or otherwise exist.

346. Prior to commercial development and large-scale manufacture and use of AFFF containing PFAS, no such PFAS had been found or detected in human blood.

**A. AFFF / PFAS Hazardous Effects on Humans**

347. AFFF and its components are associated with a wide variety of adverse health effects in humans.

348. Exposure to AFFF Defendants' products has been linked to serious medical conditions including, but not limited to, kidney cancer, testicular cancer, liver cancer, testicular tumors, pancreatic cancer, prostate cancer, leukemia, lymphoma, bladder cancer, thyroid disease and infertility.

349. By at least the end of the 1960s, animal toxicity testing performed by some Defendants manufacturing and/or using PFAS indicated that exposure to such materials, including at least PFOA, resulted in various adverse health effects among multiple species of laboratory animals, including toxic effects to the liver, testes, adrenals, and other organs and bodily systems.

350. By at least the end of the 1960s, additional research and testing performed by some Defendants manufacturing and/or using PFAS indicated that such materials, including at least PFOA, because of their unique chemical structure, were resistant to environmental degradation and would persist in the environment essentially unaltered if allowed to enter the environment.

351. By at least the end of the 1970s, additional research and testing performed by some Defendants manufacturing and/or using PFAS indicated that one or more such materials, including at least PFOA and PFOS, because of their unique chemical structure, would bind to proteins in the blood of animals and humans exposed to such materials where such materials would remain and persist over long periods of time and would accumulate in the blood/body of the exposed individuals with each additional exposure.

352. By at least the end of the 1980s, additional research and testing performed by some Defendants manufacturing and/or using PFAS indicated that at least one such PFAS, PFOA, had caused Leydig cell (testicular) tumors in a chronic cancer study in rats, resulting in at least one such Defendant, DuPont, classifying such PFAS internally as a confirmed animal carcinogen and possible human carcinogen.

353. It was understood by AFFF Defendants by at least the end of the 1980s that a chemical that caused cancer in animal studies must be presumed to present a cancer risk to humans, unless the precise mechanism of action by which the tumors were caused was known and would not occur in humans.

354. By at least the end of the 1980s, scientists had not determined the precise mechanism of action by which any PFAS caused tumors. Therefore, scientific principles of carcinogenesis classification mandated AFFF Defendants presume any such PFAS material that caused tumors in animal studies could present a potential cancer risk to exposed humans.

355. By at least the end of the 1980s, additional research and testing performed by some Defendants manufacturing and/or using PFAS, including at least DuPont, indicated that elevated incidence of certain cancers and other adverse health effects, including elevated liver enzymes and birth defects, had been observed among workers exposed to such materials, including at least

PFOA, but such data was not published, provided to governmental entities as required by law, or otherwise publicly disclosed at the time.

356. By at least the end of the 1980s, some Defendants, including at least 3M and DuPont, understood that, not only did PFAS, including at least PFOA and PFOS, get into and persist and accumulate in the human blood and in the human body, but that once in the human body and blood, particularly the longer-chain PFAS, such as PFOS and PFOA, had a long half-life. Meaning that it would take a very long time before even half of the material would start to be eliminated, which allowed increasing levels of the chemicals to build up and accumulate in the blood and/or body of exposed individuals over time, particularly if any level of exposure continued.

357. By at least the end of the 1990s, additional research and testing performed by some Defendants manufacturing and/or using PFAS, including at least 3M and DuPont, indicated that at least one such PFAS, PFOA, had caused a triad of tumors (Leydig cell (testicular), liver, and pancreatic) in a second chronic cancer study in rats.

358. By at least the end of the 1990s, the precise mechanism(s) of action by which any PFAS caused each of the tumors found in animal studies had still not been identified, mandating that AFFF Defendants continue to presume that any such PFAS that caused such tumors in animal studies could present a potential cancer risk to exposed humans.

359. By at least 2010, additional research and testing performed by some Defendants manufacturing and/or using PFAS, including at least 3M and DuPont, revealed multiple potential adverse health impacts among workers exposed to such PFAS, including at least PFOA, such as increased cancer incidence, hormone changes, lipid changes, and thyroid and liver impacts.

360. When the United States Environmental Protection Agency (“USEPA”) and other state and local public health agencies and officials first began learning of PFAS exposure in the United

States and potential associated adverse health effects, AFFF Defendants repeatedly assured and represented to such entities and the public that such exposure presented no risk of harm and were of no significance.

361. After the USEPA and other entities began asking Defendants to stop manufacturing and/or using certain PFAS, AFFF Defendants began manufacturing and/or using and/or began making and/or using more of certain other and/or “new” PFAS, including PFAS materials with six or fewer carbons, such as GenX (collectively “Short-Chain PFAS”).

362. AFFF Defendants manufacturing and/or using Short-Chain PFAS, including at least DuPont and 3M, are aware that one or more such Short-Chain PFAS materials also have been found in human blood.

363. By at least the mid-2010s, AFFF Defendants, including at least DuPont and Chemours, were aware that at least one Short-Chain PFAS had been found to cause the same triad of tumors (Leydig (testicular), liver, and pancreatic) in a chronic rat cancer study as had been found in a chronic rat cancer study with a non-Short-Chain PFAS.

364. Research and testing performed by and/or on behalf of AFFF Defendants making and/or using Short-Chain PFAS indicates that such Short-Chain PFAS materials present the same, similar, and/or additional risks to human health as had been found in research on other PFAS materials, including cancer risk.

365. Nevertheless, AFFF Defendants repeatedly assured and represented to governmental entities and the public (and continue to do so) that the presence of PFAS, including Short-Chain PFAS, in human blood at the levels found within the United States present no risk of harm and is of no legal, toxicological, or medical significance of any kind.



366. At all relevant times, AFFF Defendants, individually and/or collectively, possessed the resources and ability but have intentionally, purposefully, recklessly, and/or negligently chosen not to fund or sponsor any study, investigation, testing, and/or other research of any kind of the nature that AFFF Defendants claim is necessary to confirm and/or prove that the presence of any one and/or combination of PFAS in human blood causes any disease and/or adverse health impact of any kind in humans, presents any risk of harm to humans, and/or is of any legal, toxicological, or medical significance to humans, according to standards AFFF Defendants deem acceptable.

367. Even after an independent science panel, known as the “C8 Science Panel,” publicly announced in the 2010s that human exposure to 0.05 parts per billion or more of one PFAS, PFOA, had “probable links” with certain human diseases, including kidney cancer, testicular cancer, ulcerative colitis, thyroid disease, preeclampsia, and medically-diagnosed high cholesterol, AFFF Defendants repeatedly assured and represented to governmental entities, their customers, and the public (and continue to do so) that the presence of PFAS in human blood at the levels found within the United States presents no risk of harm and is of no legal, toxicological, or medical significance of any kind, and have represented to and assured such governmental entities, their customers, and the public (and continue to do so) that the work of the independent C8 Science Panel was inadequate.

368. At all relevant times, AFFF Defendants shared and/or should have shared among themselves all relevant information relating to the presence, biopersistence, and bioaccumulation of PFAS in human blood and associated toxicological, epidemiological, and/or other adverse effects and/or risks.

369. As of the present date, blood serum testing and analysis by AFFF Defendants, independent scientific researchers, and/or government entities has confirmed that PFAS materials are clinically demonstrably present in approximately 99% of the current population of the United States.

370. There is no naturally-occurring “background,” normal, and/or acceptable level or rate of any PFAS in human blood, as all PFAS detected and/or present in human blood is present and/or detectable in such blood as a direct and proximate result of the acts and/or omissions of Defendants.

371. At all relevant times, Defendants, through their acts and/or omissions, controlled, minimized, trivialized, manipulated, and/or otherwise influenced the information that was published in peer-review journals, released by any governmental entity, and/or otherwise made available to the public relating to PFAS in human blood and any alleged adverse impacts and/or risks associated therewith, effectively preventing Plaintiffs from discovering the existence and extent of any injuries/harm as alleged herein.

372. At all relevant times, Defendants, through their acts and/or omissions, took steps to attack, challenge, discredit, and/or otherwise undermine any scientific studies, findings, statements, and/or other information that proposed, alleged, suggested, or even implied any potential adverse health effects or risks and/or any other fact of any legal, toxicological, or medical significance associated with the presence of PFAS in human blood.

373. At all relevant times, Defendants, through their acts and/or omissions, concealed and/or withheld information from their customers, governmental entities, and the public that would have properly and fully alerted Plaintiffs to the legal, toxicological, medical, or other significance and/or risk from having any PFAS material in Plaintiffs’ blood.

374. At all relevant times, Defendants encouraged the continued and even further increased use of PFAS by their customers and others, including but not limited to the manufacture, use, and release, of AFFF containing PFAS and/or emergency responder protection gear or equipment coated with materials made with or containing PFAS, and tried to encourage and foster the increased and further use of PFAS in connection with as many products/uses/and applications as possible, despite knowledge of the toxicity, persistence, and bioaccumulation concerns associated with such activities.

375. To this day, Defendants deny that the presence of any PFAS in human blood, at any level, is an injury or presents any harm or risk of harm of any kind, or is otherwise of any legal, toxicological, or medical significance.

376. To this day, Defendants deny that any scientific study, research, testing, or other work of any kind has been performed that is sufficient to suggest to the public that the presence of any PFAS material in human blood, at any level, is of any legal, toxicological, medical, or other significance.

377. Defendants, to this day, affirmatively assert and represent to governmental entities, their customers, and the public that there is no evidence that any of the PFAS found in human blood across the United States causes any health impacts or is sufficient to generate an increased risk of future disease sufficient to warrant diagnostic medical testing, often referring to existing studies or data as including too few participants or too few cases or incidents of disease to draw any scientifically credible or statistically significant conclusions.

378. Defendants were and/or should have been aware, knew and/or should have known, and/or foresaw or should have foreseen that their design, marketing, development, manufacture, distribution, release, training and response of users, production of instructional materials, sale

and/or other handling and/or use of AFFF containing PFAS would result in the contamination of the blood and/or body of Plaintiffs with PFAS, and the biopersistence and bioaccumulation of such PFAS in their blood and/or body.

379. Defendants were and /or should have been aware, or knew and/or should have known, and/or foresaw or should have foreseen that allowing PFAS to contaminate the blood and/or body of Plaintiffs would cause injury, irreparable harm, and/or unacceptable risk of such injury and/or irreparable harm to Plaintiffs.

380. Defendants did not seek or obtain permission or consent from Plaintiffs before engaging in such acts and/or omissions that caused, allowed, and/or otherwise resulted in Plaintiffs' exposure to AFFF and the contamination of Plaintiffs' blood and/or body with PFAS materials, and resulting biopersistence and bioaccumulation of such PFAS in their blood and/or body.

#### **B. Defendants' History of Manufacturing and Selling AFFF**

381. 3M began producing PFOS and PFOA by electrochemical fluorination in the 1940s. In the 1960s, 3M used its fluorination process to develop AFFF.

382. 3M manufactured, marketed, and sold AFFF from the 1960s to the early 2000s.

383. National Foam and Tyco/Ansul began to manufacture, market, and sell AFFF in the 1970s.

384. Buckeye began to manufacture, market, and sell AFFF in the 2000s.

385. In 2000, 3M announced it was phasing out its manufacture of PFOS, PFOA, and related products, including AFFF. 3M, in its press release announcing the phase out, stated "our products are safe," and that 3M's decision was "based on [its] principles of responsible environment management." 3M further stated that "the presence of these materials at [] very low levels does not pose a human health or environmental risk." In communications with the EPA at that time,

3M also stated that it had “concluded that...other business opportunities were more deserving of the company’s energies and attention...”

386. Following 3M’s exit from the AFFF market, the remaining AFFF Defendants continued to manufacture and sell AFFF that contained PFAS and/or its precursors.

387. AFFF Defendants knew their customers warehoused large stockpiles of AFFF. In fact, AFFF Defendants marketed their AFFF products by touting its shelf-life. Even after AFFF Defendants fully understood the toxicity of PFAS, and their impacts to the health of humans following exposure, AFFF Defendants concealed the true nature of PFAS. While AFFF Defendants phased out production or transitioned to other formulas, they did not instruct their customers that they should not use AFFF that contained PFAS and/or their precursors. AFFF Defendants further did not act to get their harmful products off the market.

388. AFFF Defendants did not warn public entities, firefighter trainees who they knew would foreseeably come into contact with their AFFF products, or firefighters employed by either civilian and/or military employers that use of and/or exposure to AFFF Defendants’ products containing PFAS and/or its precursors would pose a danger to human health

389. The Plaintiffs directly used, were exposed, and/or were given AFFF to help fight fires on a regular basis.

390. The Plaintiffs were never informed that this product was inherently dangerous. Nor were the Plaintiff warned about the known health risks associated with this product.

391. The Plaintiffs never received or were told to use any protective gear to guard against the known dangerous propensities of this product.

392. AFFF Defendants have known of the health hazards associated with AFFF and/or its compounds for decades and that in their intended and/or common use would harm human health.

393. Information regarding AFFF and its compounds were readily accessible to each of the above-referenced AFFF Defendants for decades because each is an expert in the field of AFFF manufacturing and/or the materials needed to manufacture AFFF, and each has detailed information and understanding about the chemical compounds that form AFFF products.

394. The AFFF Defendants' manufacture, distribution and/or sale of AFFF resulted in the Plaintiffs and other individuals who came in contact with the chemical to develop cancer.

395. The AFFF Defendants through their manufacturing, distribution and/or sale of AFFF, and through their involvement and/or participation in the creation of training and instructional materials and activities, knew, foresaw, and/or should have known and/or foreseen that the Plaintiffs and those similarly situated would be harmed.

396. The AFFF Defendants' products were unreasonably dangerous and the Defendants failed to warn of this danger.

### **C. PFAS-Containing Turnout Gear**

397. During firefighting training and when responding to fires and performing fire extinguishment, firefighters wear turnouts that are intended to provide a degree of thermal, chemical, and biological protection for a firefighter. Turnout gear components include individual components such as a helmet, hood, jacket, pants and suspenders, boots, and gloves. Each component of the jacket and pants are made of an outer layer, as well as several inner layers that include a moisture barrier and thermal liner which are meant to protect the firefighter from ambient heat.

398. PFAS chemicals are used in turnout gear to impart heat, water, and stain resistance to the outer shell and moisture barrier of turnout gear.

399. A June 2020 study of turnout gear by researchers at the University of Notre Dame analyzed 30 new and used turnout jackets and pants originally marketed, distributed and sold in 2008, 2014, and 2017, by six turnout gear makers, including Defendants MSA, Globe, Lion and Honeywell and found high levels of PFAS in turnout gear worn, used, or handled by firefighters, including the Firefighter Plaintiffs.

400. When exposed to heat, PFAS chemicals in the turnouts off-gas, break down, and degrade into highly mobile and toxic particles and dust, exposing firefighters to PFAS chemicals, particles and dust, including through skin contact/absorption, ingestion (e.g., hand-to-mouth contact) and/or inhalation. Further firefighter exposure to these highly mobile and toxic materials occurs through normal workplace activities, because particles or dust from their turnouts spread to fire vehicles and fire stations, as well as firefighters' personal vehicles and homes.

401. Such workplace exposure to PFAS or PFAS-containing materials has been found to be toxic to humans. As far back as a July 31, 1980 internal memo, DuPont officials described measures that were needed to prevent workplace exposure to PFOA, which they knew could permeate all protective materials, and noted that PFOA's toxicity varied depending on the exposure pathway, acknowledging that ingestion was "slightly toxic," dermal contact was "slightly to moderately toxic" and inhalation was "highly toxic." The memo concluded "continued exposure is not tolerable."

402. As alleged herein, the Firefighter Plaintiffs wear and/or wore turnouts in the ordinary course of performing their duties, as the turnouts were intended to be used and in a foreseeable manner, which exposed them to significant levels of PFAS.

403. The Firefighter Plaintiffs did not know, and in the exercise of reasonable diligence could not have known, that the turnouts they wore or used in the course of performing their duties

contained PFAS or PFAS-containing materials, and similarly did not know and could not have known that they routinely suffered exposure to PFAS or PFAS-containing materials in the turnouts they wore or used in performing their duties. The turnout gear worn or used by the Firefighter Plaintiffs did not and does not contain labeling information saying that the gear contains PFAS, and similarly did not and does not warn the Firefighter Plaintiffs of the health risks associated with exposure to PFAS.

404. Like fire departments across the country, many Plaintiffs only had one set of turnouts for years, and would wash their turnouts at home and/or in station machines along with their daily station wear uniforms.

### **CAUSES OF ACTION**

#### **COUNT I – NEGLIGENCE**

405. Plaintiffs hereby incorporate by reference the allegations contained in the preceding paragraphs of this Complaint as if restated in full herein.

406. Defendants had a duty to individuals, including the Plaintiffs, to exercise reasonable ordinary, and appropriate care in the manufacturing, design, labeling, packaging, testing, instruction, warning, selling, marketing, distribution, and training related to the AFFF or TOG product.

407. Defendants breached their duty of care and were negligent, grossly negligent, reckless and willful as described herein in the design, manufacture, labeling, warning, instruction, training, selling, marketing, and distribution of the AFFF or TOG products or underlying PFAS containing chemicals used in AFFF or TOG production in one or more of the following respects:



- a. Failing to design the products so as to avoid an unreasonable risk of harm to individuals, including the Plaintiffs;
- b. Failing to use reasonable care in the testing of the products so as to avoid an unreasonable risk of harm to individuals, including the Plaintiffs;
- c. Failing to use appropriate care in inspecting the products so as to avoid an unreasonable risk of harm to individuals, including the Plaintiffs;
- d. Failing to use appropriate care in instructing and/or warning the public as set forth herein of risks associated with the products, so as to avoid unreasonable risk of harm to individuals, including the Plaintiffs;
- e. Failing to use reasonable care in marketing, promoting, and advertising the products so as to avoid unreasonable risk of harm to individuals, including the Plaintiffs;
- f. Otherwise negligently or carelessly designing, manufacturing, marketing, distributing, warning; and
- g. In selling and or distributing a product which was inherently dangerous to the public;

408. As a direct and proximate result of Defendants' negligence, the Plaintiffs have been injured, sustained severe and permanent pain, suffering, disability, impairment, loss of enjoyment of life, loss of care, comfort, economic loss and damages including, but not limited to medical expenses, lost income, and/or other damages.

WHEREFORE, the Plaintiffs pray judgments against the Defendants for actual, compensatory, consequential, and punitive damages, together with the costs of this action, and for such other and further relief as this Court may deem fit, just, and proper.

### **COUNT II – BATTERY**

409. Plaintiffs hereby incorporate by reference the allegations contained in the preceding paragraphs of this Complaint as if restated in full herein.

410. At all relevant times, Defendants possessed knowledge that the AFFF or TOG containing PFAS which they designed, engineered, manufactured, fabricated, sold, handled, released,

trained users on, produced instructional materials for, used, and/or distributed were bio-persistent, bio- accumulative, toxic, potentially carcinogenic, and/or otherwise harmful/injurious and that their continued manufacture, use, sale, handling, release, and distribution would result in Plaintiffs having PFAS in Plaintiffs' blood, and the biopersistence and bioaccumulation of such PFAS in Plaintiffs' blood.

411. However, despite possessing such knowledge, Defendants knowingly, purposefully, and/or intentionally continued to engage in such acts and/or omissions, including but not limited to all such acts and/or omissions described in this Complaint, that continued to result in Plaintiffs accumulating PFAS in Plaintiffs' blood and/or body, and such PFAS persisting and accumulating in Plaintiffs' blood and/or body.

412. Defendants did not seek or obtain permission or consent from Plaintiffs to put or allow PFAS materials into Plaintiffs' blood and/or body, or to persist in and/or accumulate in Plaintiffs' blood and/or body.

413. Entry into, persistence in, and accumulation of such PFAS in Plaintiffs' body and/or blood without permission or consent is an unlawful and harmful and/or offensive physical invasion and/or contact with Plaintiffs' person and unreasonably interferes with Plaintiffs' rightful use and possession of Plaintiffs' blood and/or body.

414. At all relevant times, the PFAS present in the blood of Plaintiffs originated from Defendants' acts and/or omissions.

415. Defendants continue to knowingly, intentionally, and/or purposefully engage in acts and/or omissions that result in the unlawful and unconsented-to physical invasion and/or contact with Plaintiffs that resulted in persisting and accumulating levels of PFAS in Plaintiffs' blood.

416. Plaintiffs, and any reasonable person, would find the contact at issue harmful and/or offensive.

417. Defendants acted intentionally with the knowledge and/or belief that the contact, presence and/or invasion of PFAS with, onto and/or into Plaintiffs' blood serum, including its persistence and accumulation in such serum, was substantially certain to result from those very acts and/or omissions.

418. Defendants' intentional acts and/or omissions resulted directly and/or indirectly in harmful contact with Plaintiffs' blood and/or body.

419. The continued presence, persistence, and accumulation of PFAS in the blood and/or body of Plaintiffs is offensive, unreasonable, and/or harmful, and thereby constitutes a battery.

420. The presence of PFAS in the blood and/or body of Plaintiffs altered the structure and/or function of such blood and/or body parts and resulted in cancer.

421. As a direct and proximate result of the foregoing acts and omissions, Plaintiffs suffered physical injury for which Defendants are therefore liable.

WHEREFORE, the Plaintiffs pray judgments against the Defendants for actual, compensatory, consequential, and punitive damages, together with the costs of this action, and for such other and further relief as this Court may deem fit, just, and proper.

### **COUNT III – INADEQUATE WARNING**

422. Plaintiffs hereby incorporate by reference the allegations contained in the preceding paragraphs of this Complaint as if restated in full herein.

423. Defendants knew or should have known:

- a) exposure to AFFF or TOG containing PFAS was hazardous to human health;

- b) the manner in which they were designing, marketing, developing, manufacturing, distributing, releasing, training, instructing, promoting, and selling AFFF or TOG containing PFAS was hazardous to human health; and
- c) the manner in which they were designing, marketing, developing, manufacturing, marketing, distributing, releasing, training, instructing, promotion and selling AFFF or TOG containing PFAS would result in the contamination of Plaintiffs' blood and/or body as a result of exposure.

424. Defendants had a duty to warn of the hazards associated with AFFF or TOG containing PFAS entering the blood and/or body of Plaintiffs because they knew of the dangerous, hazardous, and toxic properties of AFFF or TOG containing PFAS. Defendants failed to provide sufficient warning to purchasers that the use of their AFFF or TOG products would cause PFAS to be released and cause the exposure and bioaccumulation of these toxic chemicals in the blood and/or body of Plaintiffs.

425. Adequate instructions and warnings on the AFFF or TOG containing PFAS could have reduced or avoided these foreseeable risks of harm and injury to Plaintiffs. If Defendants provided adequate warnings:

- a) Plaintiffs could have and would have taken measures to avoid or lessen exposure; and
- b) end users and governments could have taken steps to reduce or prevent the release of PFASs into the blood and/or body of Plaintiffs. Defendants' failure to warn was a direct and proximate cause of Plaintiffs' injuries from PFAS that came from the use, storage, and disposal of AFFF or TOG containing PFAS. Crucially, Defendants' failure to provide adequate and sufficient warnings for the AFFF or TOG containing PFAS they designed, marketed, manufactured, distributed, released, promoted, and sold renders the AFFF or TOG a defective product.

426. Defendants were negligent in their failure to provide Plaintiffs with adequate warnings or instruction that the use of their AFFF or TOG products would cause PFAS to be released into the blood and/or body of Plaintiffs. As a result of Defendants' conduct and the resulting contamination, Plaintiffs suffered severe personal injuries by exposure to AFFF or TOG containing PFAS.

427. Defendants' negligent failure to warn directly and proximately caused the harm to and damages suffered by Plaintiffs.

WHEREFORE, the Plaintiffs pray judgments against the Defendants for actual, compensatory, consequential, and punitive damages, together with the costs of this action, and for such other and further relief as this Court may deem fit, just, and proper.

#### **COUNT IV – DESIGN DEFECT**

428. Plaintiffs hereby incorporate by reference the allegations contained in the preceding paragraphs of this Complaint as if restated in full herein.

429. Defendants knew or should have known:

- a) exposure to AFFF or TOG containing PFAS is hazardous to human health;
- b) the manner in which AFFF or TOG containing PFAS was designed, manufactured, marketed, distributed, and sold was hazardous to human health; and
- c) the manner in which AFFF or TOG containing PFAS was designed, manufactured, marketed, distributed, and could and would release PFAS into Plaintiffs and cause the exposure and bioaccumulation of these toxic and poisonous chemicals in the blood and/or body of Plaintiffs.

430. Knowing of the dangerous and hazardous properties of the AFFF or TOG containing PFAS, Defendants could have designed, manufactured, marketed, distributed, and sold alternative designs or formulations of AFFF or TOG that did not contain hazardous and toxic PFAS. These alternative designs and formulations were already available, practical, and technologically feasible. The use of these alternative designs would have reduced or prevented reasonably foreseeable harm to Plaintiff caused by the Defendants' design, manufacture, marketing, distribution, and sale of AFFF or TOG containing hazardous and toxic PFAS.

431. The AFFF or TOG containing PFAS that was designed, manufactured, marketed, distributed, and sold by the Defendants was so hazardous, toxic, and dangerous to human health

that the act of designing, formulating, manufacturing, marketing, distributing, and selling this AFFF was unreasonably dangerous under the circumstances.

432. The AFFF or TOG designed, formulated, manufactured, marketed, distributed, and sold by Defendants was defectively designed and the foreseeable risk of harm could and would have been reduced or eliminated by the adoption of a reasonable alternative design that was not unreasonably dangerous. Defendants' defective design and formulation of AFFF or TOG containing PFAS was a direct and proximate cause of the contamination of the blood and/or body of Plaintiffs and the persistence and accumulation of PFAS in Plaintiffs' blood and/or body.

433. Defendants' defective design and formulation of AFFF or TOG containing PFAS caused the contamination described herein resulting in personal injuries to Plaintiffs. As a direct result of the harm and injury caused by Defendants' defective design and the contamination described herein, Plaintiffs have been exposed to AFFF or TOG containing PFAS and other toxic substances and has developed cancer.

434. Defendants' negligent failure to design a reasonably safe product directly and proximately caused the harm to and damages suffered by Plaintiffs.

WHEREFORE, the Plaintiffs pray judgments against the Defendants for actual, compensatory, consequential, and punitive damages, together with the costs of this action, and for such other and further relief as this Court may deem fit, just, and proper.

#### **COUNT V – STRICT LIABILITY (STATUTORY)**

435. Plaintiffs hereby incorporate by reference the allegations contained in the preceding paragraphs of this Complaint as if restated in full herein.

436. Plaintiffs asserts any and all remedies available under statutory causes of action from Plaintiffs' states for strict liability against each Defendant.

437. The Defendants were engaged in designing, manufacturing, marketing, selling, and distribution of AFFF or TOG.

438. The AFFF or TOG was in a defective condition and unreasonably dangerous to users and/or consumers when designed, manufactured, marketed, sold, and/or distributed to the public by the Defendants.

439. As a direct and proximate result of the Defendants products' aforementioned defects, the Plaintiffs have been injured, sustained severe and permanent pain, suffering, disability, impairment, loss of enjoyment of life, loss of care, comfort, economic loss and damages including, but not limited to medical expenses, lost income, and other damages.

440. The Defendants are strictly liable in tort to the Plaintiffs for their wrongful conduct.

WHEREFORE, the Plaintiffs pray judgments against the Defendants for actual, compensatory, consequential, and punitive damages, together with the costs of this action, and for such other and further relief as this Court may deem fit, just, and proper.

#### **COUNT VI – STRICT LIABILITY (RESTATEMENT)**

441. Plaintiffs hereby incorporate by reference the allegations contained in the preceding paragraphs of this Complaint as if restated in full herein.

442. The Plaintiffs bring strict product liability claims under the common law, Section 402A of the Restatement of Torts (Second), and/or Restatement of Torts (Third) against Defendants.

443. As designed, manufactured, marketed, tested, assembled, equipped, distributed and/or sold by the Defendants the AFFF or TOG product was in a defective and unreasonably dangerous condition when put to reasonably anticipated use to foreseeable consumers and users, including the Plaintiffs.

444. The Defendants had available reasonable alternative designs which would have made the AFFF or TOG product safer and would have most likely prevented the injuries and damages to the Plaintiffs, thus violating state law and the Restatement of Torts.

445. The Defendants failed to properly and adequately warn and instruct the Plaintiffs as to the proper safety and use of the Defendants product.

446. The Defendants failed to properly and adequately warn and instruct the Plaintiffs regarding the inadequate research and testing of the product.

447. The Defendants' products are inherently dangerous and defective, unfit and unsafe for their intended and reasonably foreseeable uses, and do not meet or perform to the expectations.

448. As a proximate result of the Defendants' design, manufacture, marketing, sale, and distribution of the products, the Plaintiffs have been injured and sustained severe and permanent pain, suffering, disability, impairment, loss of enjoyment of life, loss of care, comfort, and consortium, and economic damages.

449. By reason of the foregoing, the Defendants are strictly liable for the injuries and damages suffered by the Plaintiffs, caused by these defects in the AFFF or TOG product.

WHEREFORE, the Plaintiffs pray judgments against the Defendants for actual, compensatory, consequential, and punitive damages, together with the costs of this action, and for such other and further relief as this Court may deem fit, just, and proper.

#### **COUNT VII – FRAUDULENT CONCEALMENT**

450. Plaintiffs hereby incorporate by reference the allegations contained in the preceding paragraphs of this Complaint as if restated in full herein.

451. Throughout the relevant time period, Defendants knew that their products were defective and unreasonably unsafe for their intended purpose.



452. Defendants fraudulently concealed from and/or failed to disclose to or warn the Plaintiffs, and the public that their products were defective, unsafe, and unfit for the purposes intended, and that they were not of merchantable quality.

453. Defendants were under a duty to the Plaintiffs and the public to disclose and warn of the defective and harmful nature of the products because:

- a) Defendants were in a superior position to know the true quality, safety and efficacy of the Defendants' products;
- b) Defendants knowingly made false claims about the safety and quality of the Defendants' product in documents and marketing materials; and
- c) Defendants fraudulently and affirmatively concealed the defective nature of the Defendants' products from the Plaintiffs.

454. The facts concealed and/or not disclosed by Defendants to the Plaintiffs were material facts that a reasonable person would have considered to be important in deciding whether or not to purchase and/or use the Defendants' products.

455. Defendants intentionally concealed and/or failed to disclose the true defective nature of the products so that the Plaintiffs would use the Defendants' products, the Plaintiffs justifiably acted or relied upon, to Plaintiffs' detriment, the concealed and/or non-disclosed facts as evidenced by Plaintiffs' use of the Defendants' products.

456. Defendants, by concealment or other action, intentionally prevented the Plaintiffs from acquiring material information regarding the lack of safety and effectiveness of the Defendants' products and are subject to the same liability to the Plaintiffs for Plaintiffs' pecuniary losses, as though Defendants had stated the non-existence of such material information regarding the Defendants' products' lack of safety and effectiveness and dangers and defects, and as though Defendants had affirmatively stated the non-existence of such matters that the Plaintiffs were thus prevented from discovering the truth. Defendants therefore have liability for fraudulent

concealment under all applicable laws, including, inter alia, Restatement (Second) of Torts §550 (1977).

457. As a proximate result of Defendants' conduct, the Plaintiffs have been injured, and sustained severe and permanent pain, suffering, disability, impairment, loss of enjoyment of life, loss of care, comfort, and economic damages.

WHEREFORE, the Plaintiffs pray judgments against the Defendants for actual, compensatory, consequential, and punitive damages, together with the costs of this action, and for such other and further relief as this Court may deem fit, just, and proper.

#### **COUNT VIII – BREACH OF EXPRESS AND IMPLIED WARRANTIES**

458. Plaintiffs hereby incorporate by reference the allegations contained in the preceding paragraphs of this Complaint as if restated in full herein.

459. At all times relevant hereto, the Defendants manufactured, marketed, labeled, and sold the AFFF or TOG products that has been previously alleged and described herein.

460. At the time the Defendants designed, developed, marketed, sold, labeled, and distributed the AFFF or TOG products, the Defendants knew of the use for which it was intended, and implied and/or expressly warranted that the product was merchantable, safe, and fit for its intended purpose.

461. The Defendants warranted that the product was merchantable and fit for the particular purpose for which it was intended and would be reasonably safe. These warranties were breached, and such breach proximately resulted in the injuries and damages suffered by the Plaintiffs.

462. The Plaintiffs are within the class of foreseeable users and reasonably relied upon Defendants' judgment, and the implied and/or express warranties in using the products.

463. The Defendants breached their implied and/or express warranties and did not meet the expectations for the performance of the product when used for its intended use and was neither of merchantable quality nor safe for its intended use in that the product has a propensity to cause serious injury, pain, and cancer.

WHEREFORE, the Plaintiffs pray judgments against the Defendants for actual, compensatory, consequential, and punitive damages, together with the costs of this action, and for such other and further relief as this Court may deem fit, just, and proper.

#### **COUNT IX – WANTONNESS**

464. Plaintiffs hereby incorporate by reference the allegations contained in the preceding paragraphs of this Complaint as if restated in full herein.

465. Defendants and their employees, agents, officers, and representatives owed a duty of care to end users of their AFFF or TOG products, including Plaintiffs.

466. Defendants breached the duty of care owed to the Plaintiffs.

467. The actions of Defendants and their employees, agents, officers, and representatives were willful and wanton and exhibited a reckless disregard for the life, health, and safety of the end users of Defendants' AFFF or TOG products, including Plaintiffs.

468. As a proximate and foreseeable consequent of the actions of Defendants, Plaintiffs were exposed to unreasonably dangerous toxic PFAS containing AFFF or TOG, which caused Plaintiffs' injury.

WHEREFORE, the Plaintiffs pray judgments against the Defendants for actual, compensatory, consequential, and punitive damages, together with the costs of this action, and for such other and further relief as this Court may deem fit, just, and proper.

#### **TOLLING OF THE STATUTE OF LIMITATIONS**

### **Discovery Rule Tolling**

469. Plaintiffs had no way of knowing about the risk of serious injury associated with the use of and exposure to PFAS until very recently.

470. Within the time period of any applicable statute of limitations, Plaintiffs could not have discovered, through the exercise of reasonable diligence, that exposure to PFAS is harmful to human health.

471. Plaintiffs did not discover and did not know of facts that would cause a reasonable person to suspect the risk associated with the use of and exposure to PFAS; nor would a reasonable and diligent investigation by Plaintiffs have disclosed that PFAS could cause personal injury.

472. For these reasons, all applicable statutes of limitations have been tolled by operation of the discovery rule with respect to Plaintiffs' claims.

### **Fraudulent Concealment Tolling**

473. All applicable statute of limitations have also been tolled by Defendants knowing and active fraudulent concealment and denial of the facts alleged herein throughout the time period relevant to this action.

474. Instead of disclosing critical safety information regarding AFFF or TOG, Defendants have consistently and falsely represented the safety of AFFF or TOG products.

475. This fraudulent concealment continues through present day.

476. Due to this fraudulent concealment, all applicable statutes of limitations have been tolled by operation of the discovery rule with respect to Plaintiffs' claims.

### **Estoppel**

477. Defendants were under a continuous duty to consumer, end users, and other persons coming into contact with their products, including Plaintiffs, to accurately provide safety

information concerning its products and the risk associated with the use of and exposure to AFFF or TOG.

478. Instead, Defendants knowingly, affirmatively, and actively concealed safety information concerning AFFF or TOG and the serious risks associated with the use of and exposure to AFFF or TOG.

479. Based on the foregoing, Defendants are estopped from relying on any statute of limitations in defense of this action.

### **PRAYER FOR RELIEF**

WHEREFORE, Plaintiffs demand judgments against all Defendants, jointly and severally, on each of the above-referenced claims and Causes of Action as follows:

Awarding compensatory damages to Plaintiffs for past and future damages, including but not limited, to pain and suffering for severe and permanent personal injuries sustained by the Plaintiffs, health care costs, medical monitoring, together with interest and costs as provided by law;

Punitive and/or exemplary damages for the wanton, willful, fraudulent, and/or reckless acts of the Defendants who demonstrated a complete disregard and reckless indifference for the safety and welfare of the Plaintiffs and of the general public and to the Plaintiffs in an amount sufficient to punish Defendants and deter future similar conduct;

Awarding Plaintiffs attorneys' fees;

Awarding Plaintiffs the costs of these proceedings; and

Such other and further relief as this Court deems just and proper.

### **JURY DEMAND**

The Plaintiff hereby demands a trial by jury.

Respectfully Submitted,

**ENVIRONMENTAL LITIGATION GROUP, P.C.**

/s/ Gregory A. Cade

Gregory A. Cade

Gary A. Anderson

Kevin B. McKie

ENVIRONMENTAL LITIGATION GROUP, P.C.

2160 Highland Avenue South

Birmingham, AL 35205

Telephone: 205-328-9200

Facsimile: 205-328-9456

**SERVE THE DEFENDANTS AT THE FOLLOWING ADDRESSES BY CERTIFIED MAIL:**

**3M COMPANY**

c/o Corporation Service Company

251 Little Falls Drive

Wilmington, New Castle, DE 19808

**AGC CHEMICALS AMERICAS INC.**

c/o The Corporation Trust Company

Corporation Trust Center

1209 Orange Street

Wilmington, DE 19801

**AMEREX CORPORATION**

c/o James M. Proctor II

2900 Highway 280

Suite 300

Birmingham, AL 35223

**ARCHROMA U.S. INC.**

c/o The Corporation Trust Company

Corporation Trust Center

1209 Orange Street

Wilmington, DE 19801

**ARKEMA INC.**

900 First Avenue

King of Prussia, PA 19406

**BUCKEYE FIRE EQUIPMENT COMPANY**

c/o A Haon Corporate Agent, Inc.

29225 Chagrin Blvd, Suite 350  
Pepper Pike, OH 44122

CARRIER GLOBAL CORPORATION  
c/o The Corporation Trust Company  
Corporation Trust Center  
1209 Orange Street  
Wilmington, DE 19801

CHEMDESIGN PRODUCTS INC.  
c/o Corporation Service Company  
251 Little Falls Drive  
Wilmington, New Castle, DE 19808

CHEMGUARD INC.  
c/o The Prentice-Hall Corporation System, Inc.  
251 Little Falls Drive  
Wilmington, New Castle, DE 19808

CHEMICALS, INC.  
c/o Ashok K. Moza  
12321 Hatcherville  
Baytown, TX 77520

CLARIANT CORPORATION  
c/o Corporation Service Company  
8040 Excelsior Drive, Suite 400  
Madison, WI 53717

CORTEVA, INC.  
c/o The Corporation Trust Company  
Corporation Trust Center  
1209 Orange Street  
Wilmington, DE 19801

DEEPWATER CHEMICALS, INC.  
c/o The Corporation Trust Company  
Corporation Trust Center  
1209 Orange Street  
Wilmington, DE 19801

DUPONT DE NEMOURS, INC.  
c/o The Corporation Trust Company  
Corporation Trust Center  
1209 Orange Street  
Wilmington, DE 19801

DYNAX CORPORATION  
c/o Corporate Systems LLC  
3500 S. Dupont Highway  
Dover, DE 19901

E.I. DUPONT DE NEMOURS AND COMPANY  
c/o The Corporation Trust Company  
Corporation Trust Center  
1209 Orange Street  
Wilmington, DE 19801

KIDDE-FENWAL, INC.  
c/o The Corporation Trust Company  
Corporation Trust Center  
1209 Orange Street  
Wilmington, DE 19801

KIDDE P.L.C.  
c/o The Corporation Trust Company  
Corporation Trust Center  
1209 Orange Street  
Wilmington, DE 19801

NATION FORD CHEMICAL COMPANY  
c/o John A. Dickson, IV  
2300 Bank Street  
Fort Mill, SC 29715

NATIONAL FOAM, INC.  
c/o The Corporation Trust Company  
Corporation Trust Center  
1209 Orange Street  
Wilmington, DE 19801

THE CHEMOURS COMPANY  
c/o The Corporation Trust Company  
Corporation Trust Center  
1209 Orange Street  
Wilmington, DE 19801

THE CHEMOURS COMPANY FC, LLC  
c/o The Corporation Trust Company  
Corporation Trust Center  
1209 Orange Street  
Wilmington, DE 19801



TYCO FIRE PRODUCTS LP  
c/o The Corporation Trust Company  
Corporation Trust Center  
1209 Orange Street  
Wilmington, DE 19801

UNITED TECHNOLOGIES CORPORATION  
c/o The Corporation Trust Company  
Corporation Trust Center  
1209 Orange Street  
Wilmington, DE 19801

UTC FIRE & SECURITY AMERICANS CORPORATION, INC.  
c/o Registered Office  
15720 Brixham Hill Ave #300  
Charlotte, NC 28277

ALLSTAR FIRE EQUIPMENT  
c/o Joseph A. Sposato  
12328 Lower Azusa Road  
Arcadia, CA 91006

FIRE-DEX, LLC  
c/o The Corporation Trust Company  
Corporation Trust Center  
1209 Orange Street  
Wilmington, DE 19801

GLOBE MANUFACTURING COMPANY LLC  
c/o CT Corporation System  
2 ½ Beacon Street  
Concord, NH 03301

HONEYWELL SAFETY PRODUCTS USA, INC.  
c/o Corporation Service Company  
251 Little Falls Drive  
Wilmington, DE 19808

LION GROUP, INC.  
c/o QI Services, Inc.  
Federal Reserve Building 4<sup>th</sup> Floor  
150 East Fourth Street  
Cincinnati, OH 45202

MALLORY SAFETY AND SUPPLY LLC

c/o Tim Loy  
1040 Industrial Way  
Longview, WA 98632

MINE SAFETY APPLIANCES CO., LLC  
c/o The Corporation Trust Company  
Corporation Trust Center  
1209 Orange Street  
Wilmington, DE 19801

MUNICIPAL EMERGENCY SERVICES, INC.  
c/o National Registered Agents, Inc.  
701 South Carson Street  
Suite 200  
Carson City, NV 89701

PBI PERFORMANCE PRODUCTS, INC.  
c/o Corporation Service Company  
251 Little Falls Drive  
Wilmington, DE 19808

SOUTHERN MILLS, INC.  
c/o Mark D. Christman  
6501 Mall Boulevard  
Union City, GA 30291

STEDFAST USA, INC.  
c/o National Registered Agents, Samantha Sutton  
300 Montvue Rd.  
Knoxville, TN 37919

W.L. GORE & ASSOCIATES INC.  
c/o The Corporation Trust Company  
Corporation Trust Center  
1209 Orange Street  
Wilmington, DE 19801

<b>State of Alabama</b> <b>Unified Judicial System</b> <b>Form C-34 Rev. 4/2017</b>	<b>SUMMONS</b> <b>- CIVIL -</b>	<b>Court Case Number</b> <b>01-CV-2023-901290.00</b>
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**IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA**  
**EARL PETERSON JR ET AL V. 3M COMPANY ET AL**

**NOTICE TO:** 3M COMPANY, C/O CORPORATION SERVICE COMPANY 251 LITTLE FALLS DRIVE, WILMINGTON, NEW CASTLE, DE 19808  
*(Name and Address of Defendant)*

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THE COMPLAINT OR OTHER DOCUMENT WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT, AND YOU MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS. YOU OR YOUR ATTORNEY ARE REQUIRED TO FILE THE ORIGINAL OF YOUR WRITTEN ANSWER, EITHER ADMITTING OR DENYING EACH ALLEGATION IN THE COMPLAINT OR OTHER DOCUMENT, WITH THE CLERK OF THIS COURT. A COPY OF YOUR ANSWER MUST BE MAILED OR HAND DELIVERED BY YOU OR YOUR ATTORNEY TO THE PLAINTIFF(S) OR ATTORNEY(S) OF THE PLAINTIFF(S),  
 GREGORY A. CADE  
*(Name(s) of Attorney(s))*

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WHOSE ADDRESS(ES) IS/ARE: 2160 Highland Avenue South, BIRMINGHAM, AL 35205  
*(Address(es) of Plaintiff(s) or Attorney(s))*

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THE ANSWER MUST BE MAILED OR DELIVERED WITHIN 30 DAYS AFTER THIS SUMMONS AND COMPLAINT OR OTHER DOCUMENT WERE SERVED ON YOU OR A JUDGMENT BY DEFAULT MAY BE RENDERED AGAINST YOU FOR THE MONEY OR OTHER THINGS DEMANDED IN THE COMPLAINT OR OTHER DOCUMENT.

**TO ANY SHERIFF OR ANY PERSON AUTHORIZED BY THE ALABAMA RULES OF CIVIL PROCEDURE TO SERVE PROCESS:**

☐ You are hereby commanded to serve this Summons and a copy of the Complaint or other document in this action upon the above-named Defendant.

☒ Service by certified mail of this Summons is initiated upon the written request of EARL PETERSON JR  
*(Name(s))*  
 pursuant to the Alabama Rules of the Civil Procedure.

04/19/2023                      /s/ JACQUELINE ANDERSON SMITH      By: \_\_\_\_\_  
*(Date)*                                      *(Signature of Clerk)*                      *(Name)*

---

☒ Certified Mail is hereby requested.                      /s/ GREGORY A. CADE  
*(Plaintiff's/Attorney's Signature)*

---

**RETURN ON SERVICE**

☐ Return receipt of certified mail received in this office on \_\_\_\_\_  
*(Date)*

☐ I certify that I personally delivered a copy of this Summons and Complaint or other document to \_\_\_\_\_  
 \_\_\_\_\_ in \_\_\_\_\_ County,  
*(Name of Person Served)*                      *(Name of County)*

Alabama on \_\_\_\_\_  
*(Date)*

\_\_\_\_\_  
*(Type of Process Server)*

\_\_\_\_\_  
*(Server's Signature)*

\_\_\_\_\_  
*(Address of Server)*

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*(Server's Printed Name)*

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<b>State of Alabama</b> <b>Unified Judicial System</b> <b>Form C-34 Rev. 4/2017</b>	<b>SUMMONS</b> <b>- CIVIL -</b>	<b>Court Case Number</b> <b>01-CV-2023-901290.00</b>
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**IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA**  
**EARL PETERSON JR ET AL V. 3M COMPANY ET AL**

**NOTICE TO:** AGC CHEMICALS AMERICAS INC., C/O THE CORPORATION TRUST COMPANY CORPORATION TRUST CENTER, 1209 ORANGE STREET, WILMINGTON, DE 19801  
*(Name and Address of Defendant)*

THE COMPLAINT OR OTHER DOCUMENT WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT, AND YOU MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS. YOU OR YOUR ATTORNEY ARE REQUIRED TO FILE THE ORIGINAL OF YOUR WRITTEN ANSWER, EITHER ADMITTING OR DENYING EACH ALLEGATION IN THE COMPLAINT OR OTHER DOCUMENT, WITH THE CLERK OF THIS COURT. A COPY OF YOUR ANSWER MUST BE MAILED OR HAND DELIVERED BY YOU OR YOUR ATTORNEY TO THE PLAINTIFF(S) OR ATTORNEY(S) OF THE PLAINTIFF(S), GREGORY A. CADE  
*(Name(s) of Attorney(s))*

WHOSE ADDRESS(ES) IS/ARE: 2160 Highland Avenue South, BIRMINGHAM, AL 35205  
*(Address(es) of Plaintiff(s) or Attorney(s))*

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*(Name(s))*  
pursuant to the Alabama Rules of the Civil Procedure.

04/19/2023 /s/ JACQUELINE ANDERSON SMITH By: \_\_\_\_\_  
*(Date) (Signature of Clerk) (Name)*

☒ Certified Mail is hereby requested. /s/ GREGORY A. CADE  
*(Plaintiff's/Attorney's Signature)*

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*(Name of Person Served) (Name of County)*

Alabama on \_\_\_\_\_  
*(Date)*

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<b>State of Alabama</b> <b>Unified Judicial System</b> <b>Form C-34 Rev. 4/2017</b>	<b>SUMMONS</b> <b>- CIVIL -</b>	<b>Court Case Number</b> <b>01-CV-2023-901290.00</b>
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**IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA**  
**EARL PETERSON JR ET AL V. 3M COMPANY ET AL**

**NOTICE TO:** AMEREX CORPORATION, C/O JAMES M. PROCTOR II 2900 HIGHWAY 280, SUITE 300, BIRMINGHAM, AL 35223  
*(Name and Address of Defendant)*

THE COMPLAINT OR OTHER DOCUMENT WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT, AND YOU MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS. YOU OR YOUR ATTORNEY ARE REQUIRED TO FILE THE ORIGINAL OF YOUR WRITTEN ANSWER, EITHER ADMITTING OR DENYING EACH ALLEGATION IN THE COMPLAINT OR OTHER DOCUMENT, WITH THE CLERK OF THIS COURT. A COPY OF YOUR ANSWER MUST BE MAILED OR HAND DELIVERED BY YOU OR YOUR ATTORNEY TO THE PLAINTIFF(S) OR ATTORNEY(S) OF THE PLAINTIFF(S),  
 GREGORY A. CADE  
*(Name(s) of Attorney(s))*

WHOSE ADDRESS(ES) IS/ARE: 2160 Highland Avenue South, BIRMINGHAM, AL 35205  
*(Address(es) of Plaintiff(s) or Attorney(s))*

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*(Name(s))*  
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04/19/2023 *(Date)*      /s/ JACQUELINE ANDERSON SMITH *(Signature of Clerk)*      By: \_\_\_\_\_ *(Name)*

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*(Plaintiff's/Attorney's Signature)*

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<b>State of Alabama</b> <b>Unified Judicial System</b> <b>Form C-34 Rev. 4/2017</b>	<b>SUMMONS</b> <b>- CIVIL -</b>	<b>Court Case Number</b> <b>01-CV-2023-901290.00</b>
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**IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA**  
**EARL PETERSON JR ET AL V. 3M COMPANY ET AL**

**NOTICE TO:** ARCHROMA U.S. INC., C/O THE CORPORATION TRUST COMPANY CORPORATION TRUST CENTER, 1209 ORANGE STREET, WILMINGTON, DE 19801  
*(Name and Address of Defendant)*

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*(Name(s) of Attorney(s))*

WHOSE ADDRESS(ES) IS/ARE: 2160 Highland Avenue South, BIRMINGHAM, AL 35205  
*(Address(es) of Plaintiff(s) or Attorney(s))*

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pursuant to the Alabama Rules of the Civil Procedure.

04/19/2023 /s/ JACQUELINE ANDERSON SMITH By: \_\_\_\_\_  
*(Date)* *(Signature of Clerk)* *(Name)*

☒ Certified Mail is hereby requested. /s/ GREGORY A. CADE  
*(Plaintiff's/Attorney's Signature)*

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<b>State of Alabama</b> <b>Unified Judicial System</b> <b>Form C-34 Rev. 4/2017</b>	<b>SUMMONS</b> <b>- CIVIL -</b>	<b>Court Case Number</b> <b>01-CV-2023-901290.00</b>
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**IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA**  
**EARL PETERSON JR ET AL V. 3M COMPANY ET AL**

**NOTICE TO:** ARKEMA INC., 900 FIRST AVENUE, KING OF PRUSSIA, PA 19406  

(Name and Address of Defendant)

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[Name(s) of Attorney(s)]

---

WHOSE ADDRESS(ES) IS/ARE: 2160 Highland Avenue South, BIRMINGHAM, AL 35205  

[Address(es) of Plaintiff(s) or Attorney(s)]

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[Name(s)]

  
pursuant to the Alabama Rules of the Civil Procedure.

04/19/2023 /s/ JACQUELINE ANDERSON SMITH By: \_\_\_\_\_  

(Date)
(Signature of Clerk)
(Name)

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☒ Certified Mail is hereby requested. /s/ GREGORY A. CADE  

(Plaintiff's/Attorney's Signature)

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(Name of Person Served)
(Name of County)

County,

Alabama on \_\_\_\_\_  

(Date)

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<b>State of Alabama</b> <b>Unified Judicial System</b> <b>Form C-34 Rev. 4/2017</b>	<b>SUMMONS</b> <b>- CIVIL -</b>	<b>Court Case Number</b> <b>01-CV-2023-901290.00</b>
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**IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA**  
**EARL PETERSON JR ET AL V. 3M COMPANY ET AL**

**NOTICE TO:** BUCKEYE FIRE EQUIPMENT COMPANY, C/O A HAON CORPORATE AGENT, INC. 29225 CHAGRIN BLVD, SUITE 350, PEPPER PIKE, OH 44122  
*(Name and Address of Defendant)*

THE COMPLAINT OR OTHER DOCUMENT WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT, AND YOU MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS. YOU OR YOUR ATTORNEY ARE REQUIRED TO FILE THE ORIGINAL OF YOUR WRITTEN ANSWER, EITHER ADMITTING OR DENYING EACH ALLEGATION IN THE COMPLAINT OR OTHER DOCUMENT, WITH THE CLERK OF THIS COURT. A COPY OF YOUR ANSWER MUST BE MAILED OR HAND DELIVERED BY YOU OR YOUR ATTORNEY TO THE PLAINTIFF(S) OR ATTORNEY(S) OF THE PLAINTIFF(S),  
GREGORY A. CADE  
*[Name(s) of Attorney(s)]*

WHOSE ADDRESS(ES) IS/ARE: 2160 Highland Avenue South, BIRMINGHAM, AL 35205  
*[Address(es) of Plaintiff(s) or Attorney(s)]*

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*[Name(s)]*  
pursuant to the Alabama Rules of the Civil Procedure.

04/19/2023 *(Date)*      /s/ JACQUELINE ANDERSON SMITH *(Signature of Clerk)*      By: \_\_\_\_\_ *(Name)*

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*(Plaintiff's/Attorney's Signature)*

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<b>State of Alabama</b> <b>Unified Judicial System</b> <b>Form C-34 Rev. 4/2017</b>	<b>SUMMONS</b> <b>- CIVIL -</b>	<b>Court Case Number</b> <b>01-CV-2023-901290.00</b>
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**IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA**  
**EARL PETERSON JR ET AL V. 3M COMPANY ET AL**

**NOTICE TO:** CARRIER GLOBAL CORPORATION, C/O UNITED AGENT GROUP INC. TATNALL BUILDING 104, 3411 SILVERSIDE ROAD, WILMINGTON, DE 19810  
*(Name and Address of Defendant)*

THE COMPLAINT OR OTHER DOCUMENT WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT, AND YOU MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS. YOU OR YOUR ATTORNEY ARE REQUIRED TO FILE THE ORIGINAL OF YOUR WRITTEN ANSWER, EITHER ADMITTING OR DENYING EACH ALLEGATION IN THE COMPLAINT OR OTHER DOCUMENT, WITH THE CLERK OF THIS COURT. A COPY OF YOUR ANSWER MUST BE MAILED OR HAND DELIVERED BY YOU OR YOUR ATTORNEY TO THE PLAINTIFF(S) OR ATTORNEY(S) OF THE PLAINTIFF(S), GREGORY A. CADE  
*(Name(s) of Attorney(s))*

WHOSE ADDRESS(ES) IS/ARE: 2160 Highland Avenue South, BIRMINGHAM, AL 35205  
*(Address(es) of Plaintiff(s) or Attorney(s))*

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04/19/2023 /s/ JACQUELINE ANDERSON SMITH By: \_\_\_\_\_  
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<b>State of Alabama</b> <b>Unified Judicial System</b> <b>Form C-34 Rev. 4/2017</b>	<b>SUMMONS</b> <b>- CIVIL -</b>	<b>Court Case Number</b> <b>01-CV-2023-901290.00</b>
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**IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA**  
**EARL PETERSON JR ET AL V. 3M COMPANY ET AL**

**NOTICE TO:** CHEMDESIGN PRODUCTS INC., C/O CORPORATION SERVICE COMPANY 251 LITTLE FALLS DR, WILMINGTON, NEW CASTLE, DE 19808  
*(Name and Address of Defendant)*

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GREGORY A. CADE  
*[Name(s) of Attorney(s)]*

WHOSE ADDRESS(ES) IS/ARE: 2160 Highland Avenue South, BIRMINGHAM, AL 35205  
*[Address(es) of Plaintiff(s) or Attorney(s)]*

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04/19/2023 *(Date)*      /s/ JACQUELINE ANDERSON SMITH *(Signature of Clerk)*      By: \_\_\_\_\_ *(Name)*

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<b>State of Alabama</b> <b>Unified Judicial System</b> <b>Form C-34 Rev. 4/2017</b>	<b>SUMMONS</b> <b>- CIVIL -</b>	<b>Court Case Number</b> <b>01-CV-2023-901290.00</b>
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**IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA**  
**EARL PETERSON JR ET AL V. 3M COMPANY ET AL**

**NOTICE TO:** CHEMGUARD INC., C/O THE PRENTICE-HALL CORPORATION SYSTEM, INC. 251 LITTLE FALLS DRIVE, WILMINGTON, NEW CASTLE, DE 19808  
*(Name and Address of Defendant)*

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*(Name(s) of Attorney(s))*

WHOSE ADDRESS(ES) IS/ARE: 2160 Highland Avenue South, BIRMINGHAM, AL 35205  
*(Address(es) of Plaintiff(s) or Attorney(s))*

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☒ Service by certified mail of this Summons is initiated upon the written request of EARL PETERSON JR  
*(Name(s))*  
pursuant to the Alabama Rules of the Civil Procedure.

04/19/2023 /s/ JACQUELINE ANDERSON SMITH By: \_\_\_\_\_  
*(Date)* *(Signature of Clerk)* *(Name)*

☒ Certified Mail is hereby requested. /s/ GREGORY A. CADE  
*(Plaintiff's/Attorney's Signature)*

**RETURN ON SERVICE**

☐ Return receipt of certified mail received in this office on \_\_\_\_\_  
*(Date)*

☐ I certify that I personally delivered a copy of this Summons and Complaint or other document to \_\_\_\_\_  
in \_\_\_\_\_ County,  
*(Name of Person Served)* *(Name of County)*

Alabama on \_\_\_\_\_  
*(Date)*

\_\_\_\_\_  
*(Type of Process Server)*

\_\_\_\_\_  
*(Server's Signature)*

\_\_\_\_\_  
*(Address of Server)*

\_\_\_\_\_  
*(Server's Printed Name)*

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*(Phone Number of Server)*

<b>State of Alabama</b> <b>Unified Judicial System</b> <b>Form C-34 Rev. 4/2017</b>	<b>SUMMONS</b> <b>- CIVIL -</b>	<b>Court Case Number</b> <b>01-CV-2023-901290.00</b>
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**IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA**  
**EARL PETERSON JR ET AL V. 3M COMPANY ET AL**

**NOTICE TO:** CHEMICALS, INC., C/O ASHOK K. MOZA 12321 HATCHERVILLE, BAYTOWN, TX 77520  

(Name and Address of Defendant)

THE COMPLAINT OR OTHER DOCUMENT WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT, AND YOU MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS. YOU OR YOUR ATTORNEY ARE REQUIRED TO FILE THE ORIGINAL OF YOUR WRITTEN ANSWER, EITHER ADMITTING OR DENYING EACH ALLEGATION IN THE COMPLAINT OR OTHER DOCUMENT, WITH THE CLERK OF THIS COURT. A COPY OF YOUR ANSWER MUST BE MAILED OR HAND DELIVERED BY YOU OR YOUR ATTORNEY TO THE PLAINTIFF(S) OR ATTORNEY(S) OF THE PLAINTIFF(S),  
GREGORY A. CADE  

[Name(s) of Attorney(s)]

WHOSE ADDRESS(ES) IS/ARE: 2160 Highland Avenue South, BIRMINGHAM, AL 35205  

[Address(es) of Plaintiff(s) or Attorney(s)]

THE ANSWER MUST BE MAILED OR DELIVERED WITHIN 30 DAYS AFTER THIS SUMMONS AND COMPLAINT OR OTHER DOCUMENT WERE SERVED ON YOU OR A JUDGMENT BY DEFAULT MAY BE RENDERED AGAINST YOU FOR THE MONEY OR OTHER THINGS DEMANDED IN THE COMPLAINT OR OTHER DOCUMENT.

**TO ANY SHERIFF OR ANY PERSON AUTHORIZED BY THE ALABAMA RULES OF CIVIL**  
**PROCEDURE TO SERVE PROCESS:**

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☒ Service by certified mail of this Summons is initiated upon the written request of EARL PETERSON JR  
pursuant to the Alabama Rules of the Civil Procedure. [Name(s)]

04/19/2023 /s/ JACQUELINE ANDERSON SMITH By: \_\_\_\_\_  
(Date) (Signature of Clerk) (Name)

☒ Certified Mail is hereby requested. /s/ GREGORY A. CADE  
(Plaintiff's/Attorney's Signature)

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Alabama on \_\_\_\_\_  
(Date)

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<b>State of Alabama</b> <b>Unified Judicial System</b> <b>Form C-34 Rev. 4/2017</b>	<b>SUMMONS</b> <b>- CIVIL -</b>	<b>Court Case Number</b> <b>01-CV-2023-901290.00</b>
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**IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA**  
**EARL PETERSON JR ET AL V. 3M COMPANY ET AL**

**NOTICE TO:** CLARIANT CORPORATION, CORPORATION SERVICE COMPANY 8040 EXCELSIOR DRIVE, SUITE 400, MADISON, WI 53717  
*(Name and Address of Defendant)*

THE COMPLAINT OR OTHER DOCUMENT WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT, AND YOU MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS. YOU OR YOUR ATTORNEY ARE REQUIRED TO FILE THE ORIGINAL OF YOUR WRITTEN ANSWER, EITHER ADMITTING OR DENYING EACH ALLEGATION IN THE COMPLAINT OR OTHER DOCUMENT, WITH THE CLERK OF THIS COURT. A COPY OF YOUR ANSWER MUST BE MAILED OR HAND DELIVERED BY YOU OR YOUR ATTORNEY TO THE PLAINTIFF(S) OR ATTORNEY(S) OF THE PLAINTIFF(S),  
 GREGORY A. CADE  
*(Name(s) of Attorney(s))*

WHOSE ADDRESS(ES) IS/ARE: 2160 Highland Avenue South, BIRMINGHAM, AL 35205  
*(Address(es) of Plaintiff(s) or Attorney(s))*

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**TO ANY SHERIFF OR ANY PERSON AUTHORIZED BY THE ALABAMA RULES OF CIVIL PROCEDURE TO SERVE PROCESS:**

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*(Name(s))*  
 pursuant to the Alabama Rules of the Civil Procedure.

04/19/2023                      /s/ JACQUELINE ANDERSON SMITH      By: \_\_\_\_\_  
*(Date)*                                      *(Signature of Clerk)*                      *(Name)*

☒ Certified Mail is hereby requested.                      /s/ GREGORY A. CADE  
*(Plaintiff's/Attorney's Signature)*

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<b>State of Alabama</b> <b>Unified Judicial System</b> <b>Form C-34 Rev. 4/2017</b>	<b>SUMMONS</b> <b>- CIVIL -</b>	<b>Court Case Number</b> <b>01-CV-2023-901290.00</b>
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**IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA**  
**EARL PETERSON JR ET AL V. 3M COMPANY ET AL**

**NOTICE TO:** CORTEVA, INC., C/O THE CORPORATION TRUST COMPANY CORPORATION TRUST CENTER, 1209 ORANGE STREET, WILMINGTON, DE 19801  
*(Name and Address of Defendant)*

THE COMPLAINT OR OTHER DOCUMENT WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT, AND YOU MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS. YOU OR YOUR ATTORNEY ARE REQUIRED TO FILE THE ORIGINAL OF YOUR WRITTEN ANSWER, EITHER ADMITTING OR DENYING EACH ALLEGATION IN THE COMPLAINT OR OTHER DOCUMENT, WITH THE CLERK OF THIS COURT. A COPY OF YOUR ANSWER MUST BE MAILED OR HAND DELIVERED BY YOU OR YOUR ATTORNEY TO THE PLAINTIFF(S) OR ATTORNEY(S) OF THE PLAINTIFF(S),  
 GREGORY A. CADE  
*(Name(s) of Attorney(s))*

WHOSE ADDRESS(ES) IS/ARE: 2160 Highland Avenue South, BIRMINGHAM, AL 35205  
*(Address(es) of Plaintiff(s) or Attorney(s))*

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*(Name(s))*  
 pursuant to the Alabama Rules of the Civil Procedure.

04/19/2023 *(Date)* /s/ JACQUELINE ANDERSON SMITH *(Signature of Clerk)* By: \_\_\_\_\_ *(Name)*

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*(Plaintiff's/Attorney's Signature)*

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<b>State of Alabama</b> <b>Unified Judicial System</b> <b>Form C-34 Rev. 4/2017</b>	<b>SUMMONS</b> <b>- CIVIL -</b>	<b>Court Case Number</b> <b>01-CV-2023-901290.00</b>
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**IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA**  
**EARL PETERSON JR ET AL V. 3M COMPANY ET AL**

**NOTICE TO:** DEEPWATER CHEMICALS, INC., C/O THE CORPORATION TRUST COMPANY CORPORATION TRUST CENTER, 1209 ORANGE STREET, WILMINGTON, DE 19801  
*(Name and Address of Defendant)*

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*(Name(s) of Attorney(s))*

WHOSE ADDRESS(ES) IS/ARE: 2160 Highland Avenue South, BIRMINGHAM, AL 35205  
*(Address(es) of Plaintiff(s) or Attorney(s))*

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*(Name(s))*  
pursuant to the Alabama Rules of the Civil Procedure.

04/19/2023 *(Date)*      /s/ JACQUELINE ANDERSON SMITH *(Signature of Clerk)*      By: \_\_\_\_\_ *(Name)*

☒ Certified Mail is hereby requested.      /s/ GREGORY A. CADE  
*(Plaintiff's/Attorney's Signature)*

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<b>State of Alabama</b> <b>Unified Judicial System</b> <b>Form C-34 Rev. 4/2017</b>	<b>SUMMONS</b> <b>- CIVIL -</b>	<b>Court Case Number</b> <b>01-CV-2023-901290.00</b>
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**IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA**  
**EARL PETERSON JR ET AL V. 3M COMPANY ET AL**

**NOTICE TO:** DUPONT DE NEMOURS, INC., C/O THE CORPORATION TRUST COMPANY CORPORATION TRUST CENTER, 1209 ORANGE STREET, WILMINGTON, DE 19801  
*(Name and Address of Defendant)*

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*(Name(s) of Attorney(s))*

WHOSE ADDRESS(ES) IS/ARE: 2160 Highland Avenue South, BIRMINGHAM, AL 35205  
*(Address(es) of Plaintiff(s) or Attorney(s))*

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*(Name(s))*  
pursuant to the Alabama Rules of the Civil Procedure.

04/19/2023 /s/ JACQUELINE ANDERSON SMITH By: \_\_\_\_\_  
*(Date)* *(Signature of Clerk)* *(Name)*

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*(Plaintiff's/Attorney's Signature)*

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<b>State of Alabama</b> <b>Unified Judicial System</b> <b>Form C-34 Rev. 4/2017</b>	<b>SUMMONS</b> <b>- CIVIL -</b>	<b>Court Case Number</b> <b>01-CV-2023-901290.00</b>
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**IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA**  
**EARL PETERSON JR ET AL V. 3M COMPANY ET AL**

**NOTICE TO:** DYNAX CORPORATION, C/O CORPORATE SYSTEMS LLC 3500 S. DUPONT HIGHWAY, DOVER, DE 19901  
*(Name and Address of Defendant)*

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THE COMPLAINT OR OTHER DOCUMENT WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT, AND YOU MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS. YOU OR YOUR ATTORNEY ARE REQUIRED TO FILE THE ORIGINAL OF YOUR WRITTEN ANSWER, EITHER ADMITTING OR DENYING EACH ALLEGATION IN THE COMPLAINT OR OTHER DOCUMENT, WITH THE CLERK OF THIS COURT. A COPY OF YOUR ANSWER MUST BE MAILED OR HAND DELIVERED BY YOU OR YOUR ATTORNEY TO THE PLAINTIFF(S) OR ATTORNEY(S) OF THE PLAINTIFF(S), GREGORY A. CADE  
*(Name(s) of Attorney(s))*

---

WHOSE ADDRESS(ES) IS/ARE: 2160 Highland Avenue South, BIRMINGHAM, AL 35205  
*(Address(es) of Plaintiff(s) or Attorney(s))*

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pursuant to the Alabama Rules of the Civil Procedure.

04/19/2023                      /s/ JACQUELINE ANDERSON SMITH      By: \_\_\_\_\_  
*(Date)*                                      *(Signature of Clerk)*                                      *(Name)*

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*(Plaintiff's/Attorney's Signature)*

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<b>State of Alabama</b> <b>Unified Judicial System</b> <b>Form C-34 Rev. 4/2017</b>	<b>SUMMONS</b> <b>- CIVIL -</b>	<b>Court Case Number</b> <b>01-CV-2023-901290.00</b>
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**IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA**  
**EARL PETERSON JR ET AL V. 3M COMPANY ET AL**

**NOTICE TO:** E.I. DUPONT DE NEMOURS AND COMPANY, C/O THE CORPORATION TRUST COMPANY CORPORATION TRUST CENTER, 1209 ORANGE STREET, WILMINGTON, DE 19801  
*(Name and Address of Defendant)*

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*(Name(s) of Attorney(s))*

WHOSE ADDRESS(ES) IS/ARE: 2160 Highland Avenue South, BIRMINGHAM, AL 35205  
*(Address(es) of Plaintiff(s) or Attorney(s))*

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04/19/2023 /s/ JACQUELINE ANDERSON SMITH By: \_\_\_\_\_  
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<b>State of Alabama</b> <b>Unified Judicial System</b> <b>Form C-34 Rev. 4/2017</b>	<b>SUMMONS</b> <b>- CIVIL -</b>	<b>Court Case Number</b> <b>01-CV-2023-901290.00</b>
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**IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA**  
**EARL PETERSON JR ET AL V. 3M COMPANY ET AL**

**NOTICE TO:** KIDDE-FENWAL, INC., C/O THE CORPORATION TRUST COMPANY CORPORATION TRUST CENTER, 1209 ORANGE STREET, WILMINGTON, DE 19801  
*(Name and Address of Defendant)*

THE COMPLAINT OR OTHER DOCUMENT WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT, AND YOU MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS. YOU OR YOUR ATTORNEY ARE REQUIRED TO FILE THE ORIGINAL OF YOUR WRITTEN ANSWER, EITHER ADMITTING OR DENYING EACH ALLEGATION IN THE COMPLAINT OR OTHER DOCUMENT, WITH THE CLERK OF THIS COURT. A COPY OF YOUR ANSWER MUST BE MAILED OR HAND DELIVERED BY YOU OR YOUR ATTORNEY TO THE PLAINTIFF(S) OR ATTORNEY(S) OF THE PLAINTIFF(S), GREGORY A. CADE  
*(Name(s) of Attorney(s))*

WHOSE ADDRESS(ES) IS/ARE: 2160 Highland Avenue South, BIRMINGHAM, AL 35205  
*(Address(es) of Plaintiff(s) or Attorney(s))*

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04/19/2023 *(Date)* /s/ JACQUELINE ANDERSON SMITH *(Signature of Clerk)* By: \_\_\_\_\_ *(Name)*

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*(Plaintiff's/Attorney's Signature)*

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<b>State of Alabama</b> <b>Unified Judicial System</b> <b>Form C-34 Rev. 4/2017</b>	<b>SUMMONS</b> <b>- CIVIL -</b>	<b>Court Case Number</b> <b>01-CV-2023-901290.00</b>
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**IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA**  
**EARL PETERSON JR ET AL V. 3M COMPANY ET AL**

**NOTICE TO:** KIDDE P.L.C., C/O THE CORPORATION TRUST COMPANY CORPORATION TRUST CENTER, 1209 ORANGE STREET, WILMINGTON, DE 19801  
*(Name and Address of Defendant)*

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 GREGORY A. CADE  
*(Name(s) of Attorney(s))*

WHOSE ADDRESS(ES) IS/ARE: 2160 Highland Avenue South, BIRMINGHAM, AL 35205  
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04/19/2023 *(Date)*      /s/ JACQUELINE ANDERSON SMITH *(Signature of Clerk)*      By: \_\_\_\_\_ *(Name)*

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<b>State of Alabama</b> <b>Unified Judicial System</b> <b>Form C-34 Rev. 4/2017</b>	<b>SUMMONS</b> <b>- CIVIL -</b>	<b>Court Case Number</b> <b>01-CV-2023-901290.00</b>
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**IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA**  
**EARL PETERSON JR ET AL V. 3M COMPANY ET AL**

**NOTICE TO:** NATION FORD CHEMICAL COMPANY, C/O JOHN A. DICKSON, IV 2300 BANK STREET, FORT MILL, SC 29715  
*(Name and Address of Defendant)*

THE COMPLAINT OR OTHER DOCUMENT WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT, AND YOU MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS. YOU OR YOUR ATTORNEY ARE REQUIRED TO FILE THE ORIGINAL OF YOUR WRITTEN ANSWER, EITHER ADMITTING OR DENYING EACH ALLEGATION IN THE COMPLAINT OR OTHER DOCUMENT, WITH THE CLERK OF THIS COURT. A COPY OF YOUR ANSWER MUST BE MAILED OR HAND DELIVERED BY YOU OR YOUR ATTORNEY TO THE PLAINTIFF(S) OR ATTORNEY(S) OF THE PLAINTIFF(S),  
GREGORY A. CADE  
*[Name(s) of Attorney(s)]*

WHOSE ADDRESS(ES) IS/ARE: 2160 Highland Avenue South, BIRMINGHAM, AL 35205  
*[Address(es) of Plaintiff(s) or Attorney(s)]*

THE ANSWER MUST BE MAILED OR DELIVERED WITHIN 30 DAYS AFTER THIS SUMMONS AND COMPLAINT OR OTHER DOCUMENT WERE SERVED ON YOU OR A JUDGMENT BY DEFAULT MAY BE RENDERED AGAINST YOU FOR THE MONEY OR OTHER THINGS DEMANDED IN THE COMPLAINT OR OTHER DOCUMENT.

**TO ANY SHERIFF OR ANY PERSON AUTHORIZED BY THE ALABAMA RULES OF CIVIL PROCEDURE TO SERVE PROCESS:**

☐ You are hereby commanded to serve this Summons and a copy of the Complaint or other document in this action upon the above-named Defendant.

☒ Service by certified mail of this Summons is initiated upon the written request of EARL PETERSON JR  
*[Name(s)]*  
pursuant to the Alabama Rules of the Civil Procedure.

04/19/2023 *(Date)*      /s/ JACQUELINE ANDERSON SMITH *(Signature of Clerk)*      By: \_\_\_\_\_ *(Name)*

☒ Certified Mail is hereby requested.      /s/ GREGORY A. CADE  
*(Plaintiff's/Attorney's Signature)*

**RETURN ON SERVICE**

☐ Return receipt of certified mail received in this office on \_\_\_\_\_  
*(Date)*

☐ I certify that I personally delivered a copy of this Summons and Complaint or other document to \_\_\_\_\_  
in \_\_\_\_\_ County,  
\_\_\_\_\_  
*(Name of Person Served)*      *(Name of County)*

Alabama on \_\_\_\_\_  
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<b>State of Alabama</b> <b>Unified Judicial System</b> <b>Form C-34 Rev. 4/2017</b>	<b>SUMMONS</b> <b>- CIVIL -</b>	<b>Court Case Number</b> <b>01-CV-2023-901290.00</b>
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**IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA**  
**EARL PETERSON JR ET AL V. 3M COMPANY ET AL**

**NOTICE TO:** NATIONAL FOAM, INC., C/O THE CORPORATION TRUST COMPANY CORPORATION TRUST CENTER, 1209 ORANGE STREET, WILMINGTON, DE 19801  
*(Name and Address of Defendant)*

THE COMPLAINT OR OTHER DOCUMENT WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT, AND YOU MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS. YOU OR YOUR ATTORNEY ARE REQUIRED TO FILE THE ORIGINAL OF YOUR WRITTEN ANSWER, EITHER ADMITTING OR DENYING EACH ALLEGATION IN THE COMPLAINT OR OTHER DOCUMENT, WITH THE CLERK OF THIS COURT. A COPY OF YOUR ANSWER MUST BE MAILED OR HAND DELIVERED BY YOU OR YOUR ATTORNEY TO THE PLAINTIFF(S) OR ATTORNEY(S) OF THE PLAINTIFF(S), GREGORY A. CADE  
*(Name(s) of Attorney(s))*

WHOSE ADDRESS(ES) IS/ARE: 2160 Highland Avenue South, BIRMINGHAM, AL 35205  
*(Address(es) of Plaintiff(s) or Attorney(s))*

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*(Name(s))*  
pursuant to the Alabama Rules of the Civil Procedure.

04/19/2023 *(Date)*      /s/ JACQUELINE ANDERSON SMITH *(Signature of Clerk)*      By: \_\_\_\_\_ *(Name)*

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<b>State of Alabama</b> <b>Unified Judicial System</b> <b>Form C-34 Rev. 4/2017</b>	<b>SUMMONS</b> <b>- CIVIL -</b>	<b>Court Case Number</b> <b>01-CV-2023-901290.00</b>
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**IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA**  
**EARL PETERSON JR ET AL V. 3M COMPANY ET AL**

**NOTICE TO:** THE CHEMOURS COMPANY, C/O THE CORPORATION TRUST COMPANY CORPORATION TRUST CENTER, 1209 ORANGE STREET, WILMINGTON, DE 19801  
*(Name and Address of Defendant)*

THE COMPLAINT OR OTHER DOCUMENT WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT, AND YOU MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS. YOU OR YOUR ATTORNEY ARE REQUIRED TO FILE THE ORIGINAL OF YOUR WRITTEN ANSWER, EITHER ADMITTING OR DENYING EACH ALLEGATION IN THE COMPLAINT OR OTHER DOCUMENT, WITH THE CLERK OF THIS COURT. A COPY OF YOUR ANSWER MUST BE MAILED OR HAND DELIVERED BY YOU OR YOUR ATTORNEY TO THE PLAINTIFF(S) OR ATTORNEY(S) OF THE PLAINTIFF(S), GREGORY A. CADE  
*(Name(s) of Attorney(s))*

WHOSE ADDRESS(ES) IS/ARE: 2160 Highland Avenue South, BIRMINGHAM, AL 35205  
*(Address(es) of Plaintiff(s) or Attorney(s))*

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*(Name(s))*  
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04/19/2023 *(Date)*      /s/ JACQUELINE ANDERSON SMITH *(Signature of Clerk)*      By: \_\_\_\_\_ *(Name)*

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*(Plaintiff's/Attorney's Signature)*

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<b>State of Alabama</b> <b>Unified Judicial System</b> <b>Form C-34 Rev. 4/2017</b>	<b>SUMMONS</b> <b>- CIVIL -</b>	<b>Court Case Number</b> <b>01-CV-2023-901290.00</b>
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**IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA**  
**EARL PETERSON JR ET AL V. 3M COMPANY ET AL**

**NOTICE TO:** THE CHEMOURS COMPANY FC, LLC, C/O THE CORPORATION TRUST COMPANY CORPORATION TRUST CENTER, 1209 ORANGE STREET, WILMINGTON, DE 19801  
*(Name and Address of Defendant)*

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*(Name(s) of Attorney(s))*

WHOSE ADDRESS(ES) IS/ARE: 2160 Highland Avenue South, BIRMINGHAM, AL 35205  
*(Address(es) of Plaintiff(s) or Attorney(s))*

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*(Name(s))*  
pursuant to the Alabama Rules of the Civil Procedure.

04/19/2023 *(Date)*      /s/ JACQUELINE ANDERSON SMITH *(Signature of Clerk)*      By: \_\_\_\_\_ *(Name)*

☒ Certified Mail is hereby requested.      /s/ GREGORY A. CADE  
*(Plaintiff's/Attorney's Signature)*

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<b>State of Alabama</b> <b>Unified Judicial System</b> <b>Form C-34 Rev. 4/2017</b>	<b>SUMMONS</b> <b>- CIVIL -</b>	<b>Court Case Number</b> <b>01-CV-2023-901290.00</b>
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**IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA**  
**EARL PETERSON JR ET AL V. 3M COMPANY ET AL**

**NOTICE TO:** TYCO FIRE PRODUCTS LP, C/O THE CORPORATION TRUST COMPANY CORPORATION TRUST CENTER, 1209 ORANGE STREET, WILMINGTON, DE 19801  
*(Name and Address of Defendant)*

THE COMPLAINT OR OTHER DOCUMENT WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT, AND YOU MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS. YOU OR YOUR ATTORNEY ARE REQUIRED TO FILE THE ORIGINAL OF YOUR WRITTEN ANSWER, EITHER ADMITTING OR DENYING EACH ALLEGATION IN THE COMPLAINT OR OTHER DOCUMENT, WITH THE CLERK OF THIS COURT. A COPY OF YOUR ANSWER MUST BE MAILED OR HAND DELIVERED BY YOU OR YOUR ATTORNEY TO THE PLAINTIFF(S) OR ATTORNEY(S) OF THE PLAINTIFF(S),  
 GREGORY A. CADE  
*(Name(s) of Attorney(s))*

WHOSE ADDRESS(ES) IS/ARE: 2160 Highland Avenue South, BIRMINGHAM, AL 35205  
*(Address(es) of Plaintiff(s) or Attorney(s))*

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*(Name(s))*  
 pursuant to the Alabama Rules of the Civil Procedure.

04/19/2023 *(Date)*      /s/ JACQUELINE ANDERSON SMITH *(Signature of Clerk)*      By: \_\_\_\_\_ *(Name)*

☒ Certified Mail is hereby requested.      /s/ GREGORY A. CADE  
*(Plaintiff's/Attorney's Signature)*

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<b>State of Alabama</b> <b>Unified Judicial System</b> <b>Form C-34 Rev. 4/2017</b>	<b>SUMMONS</b> <b>- CIVIL -</b>	<b>Court Case Number</b> <b>01-CV-2023-901290.00</b>
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**IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA**  
**EARL PETERSON JR ET AL V. 3M COMPANY ET AL**

**NOTICE TO:** UNITED TECHNOLOGIES CORPORATION, C/O THE CORPORATION TRUST COMPANY CORPORATION TRUST CENTER, 1209 ORANGE STREET, WILMINGTON, DE 19801  
*(Name and Address of Defendant)*

THE COMPLAINT OR OTHER DOCUMENT WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT, AND YOU MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS. YOU OR YOUR ATTORNEY ARE REQUIRED TO FILE THE ORIGINAL OF YOUR WRITTEN ANSWER, EITHER ADMITTING OR DENYING EACH ALLEGATION IN THE COMPLAINT OR OTHER DOCUMENT, WITH THE CLERK OF THIS COURT. A COPY OF YOUR ANSWER MUST BE MAILED OR HAND DELIVERED BY YOU OR YOUR ATTORNEY TO THE PLAINTIFF(S) OR ATTORNEY(S) OF THE PLAINTIFF(S), GREGORY A. CADE  
*(Name(s) of Attorney(s))*

WHOSE ADDRESS(ES) IS/ARE: 2160 Highland Avenue South, BIRMINGHAM, AL 35205  
*(Address(es) of Plaintiff(s) or Attorney(s))*

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*(Name(s))*  
pursuant to the Alabama Rules of the Civil Procedure.

04/19/2023 /s/ JACQUELINE ANDERSON SMITH By: \_\_\_\_\_  
*(Date)* *(Signature of Clerk)* *(Name)*

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*(Plaintiff's/Attorney's Signature)*

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<b>State of Alabama</b> <b>Unified Judicial System</b> <b>Form C-34 Rev. 4/2017</b>	<b>SUMMONS</b> <b>- CIVIL -</b>	<b>Court Case Number</b> <b>01-CV-2023-901290.00</b>
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**IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA**  
**EARL PETERSON JR ET AL V. 3M COMPANY ET AL**

**NOTICE TO:** UTC FIRE & SECURITY AMERICANS CORPORATION, INC., C/O REGISTERED OFFICE 15720 BRIXHAM HILL AVE #300, CHARLOTTE, NC 28277  
*(Name and Address of Defendant)*

THE COMPLAINT OR OTHER DOCUMENT WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT, AND YOU MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS. YOU OR YOUR ATTORNEY ARE REQUIRED TO FILE THE ORIGINAL OF YOUR WRITTEN ANSWER, EITHER ADMITTING OR DENYING EACH ALLEGATION IN THE COMPLAINT OR OTHER DOCUMENT, WITH THE CLERK OF THIS COURT. A COPY OF YOUR ANSWER MUST BE MAILED OR HAND DELIVERED BY YOU OR YOUR ATTORNEY TO THE PLAINTIFF(S) OR ATTORNEY(S) OF THE PLAINTIFF(S),  
 GREGORY A. CADE  
*(Name(s) of Attorney(s))*

WHOSE ADDRESS(ES) IS/ARE: 2160 Highland Avenue South, BIRMINGHAM, AL 35205  
*(Address(es) of Plaintiff(s) or Attorney(s))*

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*(Name(s))*  
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04/19/2023 *(Date)*      /s/ JACQUELINE ANDERSON SMITH *(Signature of Clerk)*      By: \_\_\_\_\_ *(Name)*

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*(Plaintiff's/Attorney's Signature)*

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<b>State of Alabama</b> <b>Unified Judicial System</b> <b>Form C-34 Rev. 4/2017</b>	<b>SUMMONS</b> <b>- CIVIL -</b>	<b>Court Case Number</b> <b>01-CV-2023-901290.00</b>
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**IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA**  
**EARL PETERSON JR ET AL V. 3M COMPANY ET AL**

**NOTICE TO:** ALLSTAR FIRE EQUIPMENT, C/O JOSEPH A. SPOSATO 12328 LOWER AZUSA ROAD, ARCADIA, CA 91006  

(Name and Address of Defendant)

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[Name(s) of Attorney(s)]

WHOSE ADDRESS(ES) IS/ARE: 2160 Highland Avenue South, BIRMINGHAM, AL 35205  

[Address(es) of Plaintiff(s) or Attorney(s)]

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[Name(s)]

  
pursuant to the Alabama Rules of the Civil Procedure.

04/19/2023 /s/ JACQUELINE ANDERSON SMITH By: \_\_\_\_\_  

(Date)
(Signature of Clerk)
(Name)

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(Plaintiff's/Attorney's Signature)

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County, \_\_\_\_\_

Alabama on \_\_\_\_\_  

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<b>State of Alabama</b> <b>Unified Judicial System</b> <b>Form C-34 Rev. 4/2017</b>	<b>SUMMONS</b> <b>- CIVIL -</b>	<b>Court Case Number</b> <b>01-CV-2023-901290.00</b>
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**IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA**  
**EARL PETERSON JR ET AL V. 3M COMPANY ET AL**

**NOTICE TO:** FIRE-DEX, LLC, C/O THE CORPORATION TRUST COMPANY CORPORATION TRUST CENTER, 1209 ORANGE STREET, WILMINGTON, DE 19801  
*(Name and Address of Defendant)*

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*(Name(s) of Attorney(s))*

WHOSE ADDRESS(ES) IS/ARE: 2160 Highland Avenue South, BIRMINGHAM, AL 35205  
*(Address(es) of Plaintiff(s) or Attorney(s))*

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04/19/2023 *(Date)*      /s/ JACQUELINE ANDERSON SMITH *(Signature of Clerk)*      By: \_\_\_\_\_ *(Name)*

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<b>State of Alabama</b> <b>Unified Judicial System</b> <b>Form C-34 Rev. 4/2017</b>	<b>SUMMONS</b> <b>- CIVIL -</b>	<b>Court Case Number</b> <b>01-CV-2023-901290.00</b>
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**IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA**  
**EARL PETERSON JR ET AL V. 3M COMPANY ET AL**

**NOTICE TO:** GLOBE MANUFACTURING COMPANY LLC, C/O CT CORPORATION SYSTEM 2 1/2 BEACON STREET, CONCORD, NH 03301  
*(Name and Address of Defendant)*

THE COMPLAINT OR OTHER DOCUMENT WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT, AND YOU MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS. YOU OR YOUR ATTORNEY ARE REQUIRED TO FILE THE ORIGINAL OF YOUR WRITTEN ANSWER, EITHER ADMITTING OR DENYING EACH ALLEGATION IN THE COMPLAINT OR OTHER DOCUMENT, WITH THE CLERK OF THIS COURT. A COPY OF YOUR ANSWER MUST BE MAILED OR HAND DELIVERED BY YOU OR YOUR ATTORNEY TO THE PLAINTIFF(S) OR ATTORNEY(S) OF THE PLAINTIFF(S),  
 GREGORY A. CADE  
*(Name(s) of Attorney(s))*

WHOSE ADDRESS(ES) IS/ARE: 2160 Highland Avenue South, BIRMINGHAM, AL 35205  
*(Address(es) of Plaintiff(s) or Attorney(s))*

THE ANSWER MUST BE MAILED OR DELIVERED WITHIN 30 DAYS AFTER THIS SUMMONS AND COMPLAINT OR OTHER DOCUMENT WERE SERVED ON YOU OR A JUDGMENT BY DEFAULT MAY BE RENDERED AGAINST YOU FOR THE MONEY OR OTHER THINGS DEMANDED IN THE COMPLAINT OR OTHER DOCUMENT.

**TO ANY SHERIFF OR ANY PERSON AUTHORIZED BY THE ALABAMA RULES OF CIVIL PROCEDURE TO SERVE PROCESS:**

☐ You are hereby commanded to serve this Summons and a copy of the Complaint or other document in this action upon the above-named Defendant.

☒ Service by certified mail of this Summons is initiated upon the written request of EARL PETERSON JR  
*(Name(s))*  
 pursuant to the Alabama Rules of the Civil Procedure.

04/19/2023 *(Date)*      /s/ JACQUELINE ANDERSON SMITH *(Signature of Clerk)*      By: \_\_\_\_\_ *(Name)*

☒ Certified Mail is hereby requested.      /s/ GREGORY A. CADE  
*(Plaintiff's/Attorney's Signature)*

**RETURN ON SERVICE**

☐ Return receipt of certified mail received in this office on \_\_\_\_\_  
*(Date)*

☐ I certify that I personally delivered a copy of this Summons and Complaint or other document to \_\_\_\_\_  
 \_\_\_\_\_ in \_\_\_\_\_ County,  
*(Name of Person Served)*      *(Name of County)*

Alabama on \_\_\_\_\_  
*(Date)*

\_\_\_\_\_  
*(Type of Process Server)*

\_\_\_\_\_  
*(Server's Signature)*

\_\_\_\_\_  
*(Address of Server)*

\_\_\_\_\_  
*(Server's Printed Name)*

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<b>State of Alabama</b> <b>Unified Judicial System</b> <b>Form C-34 Rev. 4/2017</b>	<b>SUMMONS</b> <b>- CIVIL -</b>	<b>Court Case Number</b> <b>01-CV-2023-901290.00</b>
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**IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA**  
**EARL PETERSON JR ET AL V. 3M COMPANY ET AL**

**NOTICE TO:** HONEYWELL SAFETY PRODUCTS USA, INC., C/O CORPORATION SERVICE COMPANY 251 LITTLE FALLS DRIVE, WILMINGTON, DE 19808  
*(Name and Address of Defendant)*

THE COMPLAINT OR OTHER DOCUMENT WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT, AND YOU MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS. YOU OR YOUR ATTORNEY ARE REQUIRED TO FILE THE ORIGINAL OF YOUR WRITTEN ANSWER, EITHER ADMITTING OR DENYING EACH ALLEGATION IN THE COMPLAINT OR OTHER DOCUMENT, WITH THE CLERK OF THIS COURT. A COPY OF YOUR ANSWER MUST BE MAILED OR HAND DELIVERED BY YOU OR YOUR ATTORNEY TO THE PLAINTIFF(S) OR ATTORNEY(S) OF THE PLAINTIFF(S),  
GREGORY A. CADE  
*[Name(s) of Attorney(s)]*

WHOSE ADDRESS(ES) IS/ARE: 2160 Highland Avenue South, BIRMINGHAM, AL 35205  
*[Address(es) of Plaintiff(s) or Attorney(s)]*

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*[Name(s)]*  
pursuant to the Alabama Rules of the Civil Procedure.

04/19/2023 *(Date)*      /s/ JACQUELINE ANDERSON SMITH *(Signature of Clerk)*      By: \_\_\_\_\_ *(Name)*

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*(Plaintiff's/Attorney's Signature)*

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<b>State of Alabama</b> <b>Unified Judicial System</b> <b>Form C-34 Rev. 4/2017</b>	<b>SUMMONS</b> <b>- CIVIL -</b>	<b>Court Case Number</b> <b>01-CV-2023-901290.00</b>
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**IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA**  
**EARL PETERSON JR ET AL V. 3M COMPANY ET AL**

**NOTICE TO:** LION GROUP, INC., C/O QI SERVICES, INC. 150 EAST FOURTH STREET, CINCINNATI, OH 45202  
*(Name and Address of Defendant)*

THE COMPLAINT OR OTHER DOCUMENT WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT, AND YOU MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS. YOU OR YOUR ATTORNEY ARE REQUIRED TO FILE THE ORIGINAL OF YOUR WRITTEN ANSWER, EITHER ADMITTING OR DENYING EACH ALLEGATION IN THE COMPLAINT OR OTHER DOCUMENT, WITH THE CLERK OF THIS COURT. A COPY OF YOUR ANSWER MUST BE MAILED OR HAND DELIVERED BY YOU OR YOUR ATTORNEY TO THE PLAINTIFF(S) OR ATTORNEY(S) OF THE PLAINTIFF(S),  
 GREGORY A. CADE  
*(Name(s) of Attorney(s))*

WHOSE ADDRESS(ES) IS/ARE: 2160 Highland Avenue South, BIRMINGHAM, AL 35205  
*(Address(es) of Plaintiff(s) or Attorney(s))*

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*(Name(s))*  
 pursuant to the Alabama Rules of the Civil Procedure.

04/19/2023 *(Date)*      /s/ JACQUELINE ANDERSON SMITH *(Signature of Clerk)*      By: \_\_\_\_\_ *(Name)*

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*(Plaintiff's/Attorney's Signature)*

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<b>State of Alabama</b> <b>Unified Judicial System</b> <b>Form C-34 Rev. 4/2017</b>	<b>SUMMONS</b> <b>- CIVIL -</b>	<b>Court Case Number</b> <b>01-CV-2023-901290.00</b>
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**IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA**  
**EARL PETERSON JR ET AL V. 3M COMPANY ET AL**

**NOTICE TO:** MALLORY SAFETY AND SUPPLY LLC, C/O TIM LOY 1040 INDUSTRIAL WAY, LONGVIEW, WA 98632

*(Name and Address of Defendant)*

THE COMPLAINT OR OTHER DOCUMENT WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT, AND YOU MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS. YOU OR YOUR ATTORNEY ARE REQUIRED TO FILE THE ORIGINAL OF YOUR WRITTEN ANSWER, EITHER ADMITTING OR DENYING EACH ALLEGATION IN THE COMPLAINT OR OTHER DOCUMENT, WITH THE CLERK OF THIS COURT. A COPY OF YOUR ANSWER MUST BE MAILED OR HAND DELIVERED BY YOU OR YOUR ATTORNEY TO THE PLAINTIFF(S) OR ATTORNEY(S) OF THE PLAINTIFF(S), GREGORY A. CADE

*(Name(s) of Attorney(s))*

WHOSE ADDRESS(ES) IS/ARE: 2160 Highland Avenue South, BIRMINGHAM, AL 35205

*(Address(es) of Plaintiff(s) or Attorney(s))*

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04/19/2023 /s/ JACQUELINE ANDERSON SMITH By: \_\_\_\_\_  
*(Date)* *(Signature of Clerk)* *(Name)*

☒ Certified Mail is hereby requested. /s/ GREGORY A. CADE  
*(Plaintiff's/Attorney's Signature)*

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<b>State of Alabama</b> <b>Unified Judicial System</b> <b>Form C-34 Rev. 4/2017</b>	<b>SUMMONS</b> <b>- CIVIL -</b>	<b>Court Case Number</b> <b>01-CV-2023-901290.00</b>
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**IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA**  
**EARL PETERSON JR ET AL V. 3M COMPANY ET AL**

**NOTICE TO:** MINE SAFETY APPLIANCES CO., LLC, C/O THE CORPORATION TRUST COMPANY CORPORATION TRUST CENTER, 1209 ORANGE STREET, WILMINGTON, DE 19801  
*(Name and Address of Defendant)*

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*(Name(s) of Attorney(s))*

WHOSE ADDRESS(ES) IS/ARE: 2160 Highland Avenue South, BIRMINGHAM, AL 35205  
*(Address(es) of Plaintiff(s) or Attorney(s))*

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*(Name(s))*  
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04/19/2023 *(Date)*      /s/ JACQUELINE ANDERSON SMITH *(Signature of Clerk)*      By: \_\_\_\_\_ *(Name)*

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*(Plaintiff's/Attorney's Signature)*

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<b>State of Alabama</b> <b>Unified Judicial System</b> <b>Form C-34 Rev. 4/2017</b>	<b>SUMMONS</b> <b>- CIVIL -</b>	<b>Court Case Number</b> <b>01-CV-2023-901290.00</b>
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**IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA**  
**EARL PETERSON JR ET AL V. 3M COMPANY ET AL**

**NOTICE TO:** MUNICIPAL EMERGENCY SERVICES, INC., C/O NATIONAL REGISTERED AGENTS, INC. 701 SOUTH CARSON STREET, SUITE 200, CARSON CITY, NV 89701  
*(Name and Address of Defendant)*

THE COMPLAINT OR OTHER DOCUMENT WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT, AND YOU MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS. YOU OR YOUR ATTORNEY ARE REQUIRED TO FILE THE ORIGINAL OF YOUR WRITTEN ANSWER, EITHER ADMITTING OR DENYING EACH ALLEGATION IN THE COMPLAINT OR OTHER DOCUMENT, WITH THE CLERK OF THIS COURT. A COPY OF YOUR ANSWER MUST BE MAILED OR HAND DELIVERED BY YOU OR YOUR ATTORNEY TO THE PLAINTIFF(S) OR ATTORNEY(S) OF THE PLAINTIFF(S), GREGORY A. CADE  
*(Name(s) of Attorney(s))*

WHOSE ADDRESS(ES) IS/ARE: 2160 Highland Avenue South, BIRMINGHAM, AL 35205  
*(Address(es) of Plaintiff(s) or Attorney(s))*

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<b>State of Alabama</b> <b>Unified Judicial System</b> <b>Form C-34 Rev. 4/2017</b>	<b>SUMMONS</b> <b>- CIVIL -</b>	<b>Court Case Number</b> <b>01-CV-2023-901290.00</b>
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**IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA**  
**EARL PETERSON JR ET AL V. 3M COMPANY ET AL**

**NOTICE TO:** PBI PERFORMANCE PRODUCTS, INC., C/O CORPORATION SERVICE COMPANY 251 LITTLE FALLS DRIVE, WILMINGTON, DE 19808  
*(Name and Address of Defendant)*

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GREGORY A. CADE  
*[Name(s) of Attorney(s)]*

WHOSE ADDRESS(ES) IS/ARE: 2160 Highland Avenue South, BIRMINGHAM, AL 35205  
*[Address(es) of Plaintiff(s) or Attorney(s)]*

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*[Name(s)]*  
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04/19/2023                      /s/ JACQUELINE ANDERSON SMITH      By: \_\_\_\_\_  
*(Date)*                                      *(Signature of Clerk)*                      *(Name)*

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<b>State of Alabama</b> <b>Unified Judicial System</b> <b>Form C-34 Rev. 4/2017</b>	<b>SUMMONS</b> <b>- CIVIL -</b>	<b>Court Case Number</b> <b>01-CV-2023-901290.00</b>
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**IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA**  
**EARL PETERSON JR ET AL V. 3M COMPANY ET AL**

**NOTICE TO:** SOUTHERN MILLS, INC., C/O MARK D. CHRISTMAN 6501 MALL BOULEVARD, UNION CITY, GA 30291  
*(Name and Address of Defendant)*

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 GREGORY A. CADE  
*(Name(s) of Attorney(s))*

WHOSE ADDRESS(ES) IS/ARE: 2160 Highland Avenue South, BIRMINGHAM, AL 35205  
*(Address(es) of Plaintiff(s) or Attorney(s))*

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04/19/2023 *(Date)*      /s/ JACQUELINE ANDERSON SMITH *(Signature of Clerk)*      By: \_\_\_\_\_ *(Name)*

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<b>State of Alabama</b> <b>Unified Judicial System</b> <b>Form C-34 Rev. 4/2017</b>	<b>SUMMONS</b> <b>- CIVIL -</b>	<b>Court Case Number</b> <b>01-CV-2023-901290.00</b>
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**IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA**  
**EARL PETERSON JR ET AL V. 3M COMPANY ET AL**

**NOTICE TO:** STEDFAST USA, INC., C/O NATIONAL REGISTERED AGENTS, SAMANTHA SUTTON 300 MONTVUE RD., KNOXVILLE, TN 37919  
*(Name and Address of Defendant)*

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 GREGORY A. CADE  
*(Name(s) of Attorney(s))*

WHOSE ADDRESS(ES) IS/ARE: 2160 Highland Avenue South, BIRMINGHAM, AL 35205  
*(Address(es) of Plaintiff(s) or Attorney(s))*

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**IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA**  
**EARL PETERSON JR ET AL V. 3M COMPANY ET AL**

**NOTICE TO:** W.L. GORE & ASSOCIATES INC., C/O THE CORPORATION TRUST COMPANY CORPORATION TRUST CENTER, 1209 ORANGE STREET, WILMINGTON, DE 19801  
*(Name and Address of Defendant)*

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GREGORY A. CADE  
*[Name(s) of Attorney(s)]*

WHOSE ADDRESS(ES) IS/ARE: 2160 Highland Avenue South, BIRMINGHAM, AL 35205  
*[Address(es) of Plaintiff(s) or Attorney(s)]*

THE ANSWER MUST BE MAILED OR DELIVERED WITHIN 30 DAYS AFTER THIS SUMMONS AND COMPLAINT OR OTHER DOCUMENT WERE SERVED ON YOU OR A JUDGMENT BY DEFAULT MAY BE RENDERED AGAINST YOU FOR THE MONEY OR OTHER THINGS DEMANDED IN THE COMPLAINT OR OTHER DOCUMENT.

**TO ANY SHERIFF OR ANY PERSON AUTHORIZED BY THE ALABAMA RULES OF CIVIL PROCEDURE TO SERVE PROCESS:**

☐ You are hereby commanded to serve this Summons and a copy of the Complaint or other document in this action upon the above-named Defendant.

☒ Service by certified mail of this Summons is initiated upon the written request of EARL PETERSON JR  
*[Name(s)]*  
pursuant to the Alabama Rules of the Civil Procedure.

04/19/2023 *(Date)*      /s/ JACQUELINE ANDERSON SMITH *(Signature of Clerk)*      By: \_\_\_\_\_ *(Name)*

☒ Certified Mail is hereby requested.      /s/ GREGORY A. CADE  
*(Plaintiff's/Attorney's Signature)*

**RETURN ON SERVICE**

☐ Return receipt of certified mail received in this office on \_\_\_\_\_  
*(Date)*

☐ I certify that I personally delivered a copy of this Summons and Complaint or other document to \_\_\_\_\_  
in \_\_\_\_\_ County,  
\_\_\_\_\_  
*(Name of Person Served)*      *(Name of County)*

Alabama on \_\_\_\_\_  
*(Date)*

\_\_\_\_\_  
*(Type of Process Server)*

\_\_\_\_\_  
*(Server's Signature)*

\_\_\_\_\_  
*(Address of Server)*

\_\_\_\_\_  
*(Server's Printed Name)*

\_\_\_\_\_  
*(Phone Number of Server)*